



Mississippi Department of Environmental Quality
Office of Pollution Control

I-sys 2000 Master Site Detail Report

Site Name: Hercules Inc

PHYSICAL ADDRESS

LINE 1: 613 West 7th Street

LINE 2:

LINE 3:

MUNICIPALITY: Hattiesburg

STATE CODE: MS

ZIP CODE: 39401-

MAILING ADDRESS

LINE 1: PO Box 1937

LINE 2:

LINE 3:

MUNICIPALITY: Hattiesburg

STATE CODE: MS

ZIP CODE: 39401-

OTHER INFORMATION

MASTER ID: 002022

COUNTY: Forrest

REGION SRO

SIC 1: 2822

AIR TYPE: TITLE V

HW TYPE: LARGE QUANTITY

SOLID TYPE:

WATER TYPE: INDUSTRIAL

BRANCH: Chemical

ECED CONTACT:

Yassin, Mohammad

BASIN:

AIR PROGRAMS

☒ SIP

☐ PSD

☐ NSPS

☐ NESHAPS

☒ MACT



**Mississippi Department of Environmental Quality
Office of Pollution Control**

Permits				
PROGRAM	PERMIT TYPE	PERMIT #	MDEQ PERMIT CONTACT	ACTIVE
HAZ. WASTE	EPA ID	MSD008182081		YES
AIR	TITLE V	080000001	Ketchum, Brian	YES
AIR	SOP	080000001	Ketchum, Brian	YES
WATER	NPDES	MS0001830	Cook, Charles	NO
WATER	NPDES	MS0001830	Cook, Charles	NO
WATER	NPDES	MS0001830	Beasley, Jerry	YES
WATER	PRE-TREATMENT	MSP091286	Tomkins, Tracy	YES
GENERAL	SARA TITLE III	MSR110153	Lavallee, Louis	YES

Compliance Actions				
MEDIA	ACTIVITY TYPE	SCHEDULED	COMPLETED	INSPECTED BY
WATER	CEI - NA	3/17/99	3/17/99	Yassin, Mohammad
WATER	CMI - PRETREATMENT	11/1/99		Sharp, Loyd
WATER	CMI - NPDES	4/1/00		Sharp, Loyd
WATER	CMI - NPDES	11/1/99		Sharp, Loyd
WATER	CEI - NA	9/30/00		Yassin, Mohammad
HAZ WASTE	Compliance Evaluation Inspect	9/30/00		Yassin, Mohammad
AIR	State Compliance Inspection	9/30/00		Yassin, Mohammad
HAZ WASTE	Compliance Evaluation Inspect	6/30/99	6/30/99	Yassin, Mohammad
AIR	State Compliance Inspection	6/29/99	6/29/99	Yassin, Mohammad
WATER	CEI - NA	6/30/99	6/30/99	Yassin, Mohammad

Add a New Site

Site Name: Hercules Incorporated
Official / Legal Name: Hercules Incorporated
Air Type: TOX 2 Water Type: Industrial HW Type: L&C

Site General Information

County: Ferry
Contact Name: Charles Jordan
Contact Title: Environmental Coordinator
Contact Phone: (601) 545-3450
Physical Address:
City, State, Zip: 613 West 7th Street
Hattisburg MS 39401
Mailing Address:
City, State, Zip: P o Box 1937
Hattisburg MS 39401
Owner's Name: _____
Owner's Address:
City, State, Zip: _____
Operator or:
Contractor Name: _____
Address: _____
City, State, Zip: _____

**BEAU OF POLLUTION CONTR
SAMPLE REQUEST FORM**

M500018,0

Lab Bench No.: 2782

Cost Code: 3700

Hercules
Charles
613 West 9th Street
Tulsa, Oklahoma 74103

I. GENERAL INFORMATION:

Facility Name: Hercules

County Code: 0800

Discharge No: 001

Sample Point Identification: Process wastewater and stormwater

Requested By: Comp. Monitoring

NPDES Permit No.: 01830

Date Requested:

Data To: Mahammad Yassin

Type of Sample: Grab: X Composite: Flow: Time: X Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Clear/cool

Collected By: J.Bonck

Where Taken: Downstream of the flume

	Type	Parameters	Preservative	Date	Time
1.	Composite	BOD,SS	Cool	10/27/98	1200
2.	Composite	TOC	5 ml H ₂ SO ₄	10/27/98	1200
3.	Grab	O&G	5 ml H ₂ SO ₄	10/27/98	1200
4.	Grab	Phenol	5 ml H ₂ SO ₄	10/27/98	1200
5.					
6.					

III. FIELD:

Analysis

Computer Req
Code

Results

Analyst

Date

pH	000400	X	7.5/7.4	JB	10/26-27/98
D.O.	000300				
Temperature	000010	X	28.8°C, 29.1°C	JB	10/26-27/98
ResidualChlorine	050060				
Flow	074060				

IV. TRANSPORTATION OF SAMPLE:

Bus: X

RO Vehicle:

Other:

V. LABORATORY:

Received by: Jackie Key

Recorded by: Dot Lewis

Date: 10/28/98

Time: 1119

Date Sent to State Office: 11-17-98

VI. Remarks:

TARGET COMPOUND LIST WET CHEMISTRY PARAMETERS

Lab Bench No.: 2782

Analysis	Computer Req Code		Result		Analyst	Date Measured or Date Test Initiated
BOD	000310	X	64.0	mg/l	KF	10/28/98
COD	000340			mg/l		
TOC	000680	X	37.0	mg/l	KF	11/4/98
Suspended Solids	099000	X	8.0	mg/l	KF	10/30/98
TKN	000625			mg/l		
Ammonia-N	000610			mg/l		
Fecal Coliform	074055		colonies/100ml			
Total Phosphorous	000665			mg/l		
Oil & Grease	000550	X	<5.0	mg/l	KF	11/2/98
Chlorides	099016			mg/l		
Phenol	032730	X	<0.05	mg/l	VS	11/9/98
Cyanide	000722			mg/l		
Nitrate-Nitrite	000630			mg/l		
Alkalinity	000410			mg/l		
Hardness	000900			mg/l		

Remarks: _____

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 2784

Cost Code: 3700

I. GENERAL INFORMATION:

Facility Name: Hercules

County Code: 0800

Discharge No: 002

Sample Point Identification:

Requested By: Comp. Monitoring

Type of Sample: Grab: X Composite: Flow:

NPDES Permit No.: 01830

Date Requested:

Data To: Mohammad Yassin

Time: Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Clear/cool

Collected By: J.Bonck

Where Taken: Below foot bridge that crosses the discharge ditch

	Type	Parameters	Preservative	Date	Time
1.					
2.					
3.					
4.					
5.					

III. FIELD:

Analysis	Computer Req Code	Results	Analyst	Date
pH	000400 X	7.5/7.5	JB	10/26-27/98
D.O.	000300			
Temperature	000010 X	26.7°C/27.4°C	JB	10/26-27/98
ResidualChlorine	050060			
Flow Total Batch	074060 X	1.0 MGD	JB	10/27/98

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other:

V. LABORATORY:

Received by: Jackie Key

Date: 10/28/98

Time: 1119

Recorded by: Dot Lewis

Date Sent to State Office: 10-29-98

VI. Remarks: No Sample

FATHEAD MINNOW ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 09/22/98 TIME STARTED: 01:00 P.M. ANALYST: JDS

REP #	A				B			
	24	48	72	96	24	48	72	96
0%	0	0	0	0	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	0	0	0	3	0	1	1	1
25%	0	0	1	4	0	0	0	0
50%	4	4	5	7	4	5	5	6
100%	10	10	10	10	10	10	10	10

LABORATORY NOTES:

Test Method: 96-hr acute definitive bioassay
 Species: *Pimephales promelas* (fathead minnow)
 Age: <24hr-old
 No. Replicates: 2
 No. Organisms/Rep: 10
 No. Dilutions: 5 + control
 Sample I.D.: Final Ditch
 Date Initiated: 09/22/98

LC₅₀ ≥ 10.7 percent
LC₅₀ = 33.47

RAW DATA CERTIFIED BY:

John D. Sullivan

DATE: *10/8/98*

Ceriodaphnia dubia ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 09/22/98 TIME STARTED: 02:30 P.M. ANALYST: JDS

NUMBER DEAD

REP #	A		B		C		D	
HOURS	24	48	24	48	24	48	24	48
0%	0	0	0	0	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	0	0	0	0	0	0	0	0
25%	0	0	0	0	0	0	0	0
50%	0	0	1	0	0	0	0	2
100%	0	1	0	1	0	1	1	2

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay
 Species: *Ceriodaphnia dubia* (water flea)
 Age: <24hr-old
 No. Replicates: 4
 No. Organisms/Rep: 5
 No. Dilutions: 5 + control
 Sample I.D.: Final Ditch
 Date Initiated: 09/22/98

$LC_{50} > 100\%$

RAW DATA CERTIFIED BY:

John D. Sullivan

DATE: 10/8/98

Appropriation Request

Detail Estimate

Page 1 of 5

16A

Date February 27, 1998 Appropriation No. 042 Drawing No. _____

Title Storm/Waste H2O Separation Plant Hattiesburg Estimated by Dan Moore Date 2/27/98

	Description	I N D	Materials			Labor		Total
			Quantity	Unit	Amount	Amount	Amount	
	Sewers, Drains, & Ditches - Foundations Account No. 8711-3							
Site 1	South East corner of Old Pexite Location--- Provide concrete drop inlet for storm water collection. Galvanized grating over drop inlet							
Site 2	Primary Separation Basin, south west of Power House--- Install new overflow concrete baffle, redirecting flow to UCD.							
Site 3	Hard Resins Area sump, south east of Providence St. T/T Loading Station--- Replace sump grating with 3/4" thick steel plate, forcing storm water around sump and into the city storm sewer just outside the plant fence.							
Site 4	Metal Resinates Area Drain, Lower manhole--- Plug outlet of manhole and install upper relief drain to open ditch inside hedge line to UCD. Marine inflatable fender for 36" pipe plug.							
Site 5	Hard Resins area trench drain to Impounding Basin--- Sand bag trench drain so it will overflow into the UCD							
Site 6	Hard Resins Rail Yard area drainage----- Sandbag covered trench just north of L.S.#3 to divert water to east.							
			Page Total			0	0	0

Appropriation Request

Detail Estimate

Page 2 of 5

16A

Date February 27, 1998 Appropriation No. 042 Drawing No. _____
 Title Storm/Waste H2O Separation Plant Hattiesburg Estimated by Dan Moore Date 2/27/98

I N D	Description	Materials		Labor		Total
		Quantity	Unit	Amount	Amount	
	Sewers, Drains, & Ditches - Foundations (continued) Account No. 8711-3					
Site 7	South East Corner of 731 Area at T/T unloading point----- Plug outlet of drop inlet leading to IB and unplug line draining from Pilot Plant. Open drainage channel in existing concrete containment area to allow drainage to Hard Resins Rail Yard.					
Site 8	Vinsol Soap Contained Area--- Plug outlet drain line on curb inlet at south east extents of existing contained area and remove road berm to allow storm water to by-pass the IB.					
Site 9	TD Sump--- Cover outlet with steel plate and fill sump with dirt.					
Site 10	Delnav, South East Area Drain--- Plug I.S. outlet and open new outlet and new inlet in the storm sewer drain 40' to the north east.					
Site 11	Tank Farm Area West of RAD--- Install open ditch thru existing dike to divert water to storm water drainage.					
Site 12	Paracol Concrete Swale to L.S.#6--- Dam swale with concrete head wall and tail wall for new PVC Industrial Sewer. Concrete roadway reconstruction.					
Page Total				0	0	0
Account Total				0	0	0

10-March 08

RAINFALL

raincal

CALCULATION BASIS: Current rainfall is approximately 15 acres

Blue data are extrapolated/estimated data from Dept of Arig data

Red data is 24hr, 10yr rainfall event from MDEQ

FROM THE STATE DEPARTMENT OF ARIG. -- WATERSHED PLANNING STAFF --

EVENT	1YR	2YR	5YR	10YR
30MIN	1.5 in	1.7 in	2.1 in	2.5 est.
1HR	1.9 in	2.1 in	2.6 in	3.0 est.
2HR	2.3 in	2.6 in	3.4 in	3.6 est.
3HR	2.5 in	2.9 in	3.6 in	4.1 est.
6HR	2.9 in	3.5 in	4.5 in	5.0 est.
24HR				7.7 in

Impounding Basin = 17,500 FT²

For 2ft void : volume = 17,500 * 2 * 7.48 = 261,800 gallons

1st inch of rainfall soak-in factor = 0.5

2nd inch of rainfall soak-in factor = 0.9

runoff delay = 30 minutes

Acres rainfall = 15

assume 407,286 gallons per inch of rainfall

For	7.7 inches in	1440 min
Rainfall=	2,659,578 net gallons	
less basin void of	261,800 gallons	
calc time =	1470 min	
pump capacity needed =	1,631 GPM	

SUMMARY : inches rainfall / gallons per minute pumping requirements

EVENT	1 YEAR	2 YEAR	5 YEAR	10 YEAR
30MIN	1.5/ 2,085	1.7/ 3,307	2.1/ 5,751	2.5est/ 8,195
1HR	1.9/ 3,019	2.1/ 3,384	2.6/ 5,870	3.0est/ 7,500
2HR	2.3/ 2,789	2.6/ 3,522	3.4/ 5,477	3.6est/ 5,966
3HR	2.5/ 2,341	2.9/ 3,040	3.6/ 4,261	4.1est/ 5,134
6HR	2.9/ 1,697	3.5/ 2,209	4.5/ 3,140	5.0est/ 3,610
24HR				7.7/ 1,631

raincal

CALCULATION BASIS: Proposed rainfall is approximately 10 acres

Blue data are extrapolated/estimated data from Dept of Arig data

Red data is 24hr, 10yr rainfall event from MDEQ

FROM THE STATE DEPARTMENT OF ARIG. - - WATERSHED PLANNING STAFF --

EVENT	1YR	2YR	5YR	10YR
30MIN	1.5 in	1.7 in	2.1 in	2.5 est.
1HR	1.9 in	2.1 in	2.6 in	3.0 est.
2HR	2.3 in	2.6 in	3.4 in	3.6 est.
3HR	2.5 in	2.9 in	3.6 in	4.1 est.
6HR	2.9 in	3.5 in	4.5 in	5.0 est.
24HR				7.7 in

Impounding Basin = 17,500 FT²

For 2ft void : volume = 17,500 * 2 * 7.48 = 261,800 gallons

1st inch of rainfall soak-in factor = 0.5

2nd inch of rainfall soak-in factor = 0.9

runoff delay = 30 minutes

Acres rainfall = 10

assume 271,524 gallons per inch of rainfall

For	2.5 inches in	30 min
Rainfall=	502,319 net gallons	
less basin void of	261,800 gallons	
calc time =	60 min	
pump capacity needed =	4,009 GPM	

SUMMARY : inches rainfall / gallons per minute pumping requirements

* From current data (15 acres) the maximum hydrolic loading
is from a 10 year, 2.5 inch rainfall event: THEREFORE

EVENT	1 YEAR	2 YEAR	5 YEAR	10 YEAR
30MIN				2.5est/ 4,009
1HR				
2HR				
3HR				
6HR				
24HR				

***Ceriodaphnia dubia* ACUTE BIOASSAY**

CLIENT: HERCULES, INC. DATE STARTED: 09/11/97 TIME STARTED: 10:45 P.M. ANALYST: RMS

REP #	NUMBER DEAD							
	A		B		C		D	
HOURS	24	48	24	48	24	48	24	48
0%	0	0	0	0	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	0	0	0	0	0	0	0	0
25%	0	0	0	0	0	0	0	0
50%	1	4	1	1	1	2	1	3
100%	3	5	5	5	5	5	4	5

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay
 Species: *Ceriodaphnia dubia* (water flea)
 Age: <24hr-old
 No. Replicates: 4
 No. Organisms/Rep: 5
 No. Dilutions: 5 + control
 Sample I.D.: Final Ditch
 Date Initiated: 9/11/97

TOTAL DEAD (FOR LC₅₀ DETERMINATION):

0% - 0
 6.25% - 0
 12.5% - 0
 25% - 0
 50% - 10
 100% - 20

LC₅₀ = 50.00% (Trimmed Spearman-Kärber Method)

RAW DATA CERTIFIED BY:

Rick M. Schenck

DATE:

10/7/97

FATHEAD MINNOW ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 09/11/97 TIME STARTED: 11:25 P.M. ANALYST: RMS

REP #	A				B			
	24	48	72	96	24	48	72	96
0%	0	1			0	1		
6.25%	0	0			0	0		
12.5%	0	1			0	0		
25%	0	1			0	2		
50%	1	8			1	5		
100%	10	10			10	10		

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay
 Species: *Pimephales promelas* (fathead minnow)
 Age: <24hr-old
 No. Replicates: 2
 No. Organisms/Rep: 10
 No. Dilutions: 5 + control
 Sample I.D.: Final Ditch
 Date Initiated: 9/11/97

TOTAL DEAD (FOR LC_{50} DETERMINATION):

0% - 2
 6.25% - 0
 12.5% - 1
 25% - 3
 50% - 13
 100% - 20

LC_{50} = 42.43% (Trimmed Spearman-Kärber Method)

RAW DATA CERTIFIED BY:

Rick M. Alencar

DATE:

10/7/97

Mohammad. Yassin

Jan

BEAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM

Lab Bench No.: 1257
Cost Code: 3200

I. GENERAL INFORMATION:

Facility Name: Hercules
County Code: 0800
Discharge No: 002
Sample Point Identification: Stormwater non-contact cooling water and 001
Requested By: Compliance Monitoring
Type of Sample: Grab: Composite: Flow: Time: Other:
NPDES Permit No.: 01830
Date Requested:
Data To: Charles Cook

II. SAMPLE IDENTIFICATION:

Environment Condition: Clear/hot
Where Taken: Effluent and discharge ditch bridge
Collected By: C.Seymour/E.White

	Type	Parameters	Preservative	Date	Time
1.					
2.					
3.					
4.					
5.					

III. FIELD:

Analysis	Computer Req Code	Results	Analyst	Date
pH	000400 X	7.37	EW	6/3/98
D.O.	000300			
Temperature	000010 X	37°C	EW	6/3/98
ResidualChlorine	050060			
Flow	074060 X	0.68 MGD	EW	6/3/98

IV. TRANSPORTATION OF SAMPLE:

Bus: X **RO Vehicle:** **Other:**

V. LABORATORY:

Received by: V. Stamps
Recorded by: Dot Lewis
Date: 6/4/98
Time: 0950
Date Sent to State Office: 6-5-98

VI. Remarks: NO SAMPLE. Composite sent to EPA for bioassay.

Lab Bench No.

1257

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 1256
Cost Code: 3200

I. GENERAL INFORMATION:

Facility Name: Hercules

County Code: 0800

Discharge No: 001

Sample Point Identification: Process wastewater and stormwater

Requested By: Compliance Monitoring

Type of Sample: Grab Composite: Flow: Time: Other:

NPDES Permit No.: 01830

Date Requested:

Data To: Charles Cook

II. SAMPLE IDENTIFICATION:

Environment Condition: Clear/hot

Where Taken: Parshall flume at 001 outfall

Collected By: E.White/C.Seymour

	Type	Parameters	Preservative	Date	Time
1.	*Grab	BOD,SS	Cool	6/3/98	1310
2.	*Grab	TOC	5 ml H ₂ SO ₄	6/3/98	1310
3.	Grab	O&G	5 ml H ₂ SO ₄	6/3/98	1310
4.	Grab	Phenol	5 ml H ₂ SO ₄	6/3/98	1310
5.					
6.					

III. FIELD:

Analysis	Computer Req Code	Results	Analyst	Date
pH	000400 X	7.28	CS	6/3/98
D.O.	000300			
Temperature	000010 X	37°C	EW	6/3/98
Residual Chlorine	050060			
Flow	074060 X	0.637 MGD	EW	6/3/98

IV. TRANSPORTATION OF SAMPLE:

Bus: X

RO Vehicle:

Other:

V. LABORATORY:

Received by: V. Stamps

Recorded by: Dot Lewis

Date: 6/4/98

Time: 0950

Date Sent to State Office: 6-17-98

VI. Remarks: *No composite samples on outfall 001, 002 composite to EPA

TARGET COMPOUND LIST WET CHEMISTRY PARAMETERS

Lab Bench No.: 1256

Analysis	Computer Req Code	Result	Analyst	Date Measured or Date Test Initiated
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BOD	000310	X	43.0 mg/l	VS	6/4/98
COD	000340		mg/l		
TOC	000680	X	17.0 mg/l	VS	6/11/98
Suspended Solids	099000	X	15.0 mg/l	KF	6/10/98
TKN	000625		mg/l		
Ammonia-N	000610		mg/l		
Fecal Coliform	074055		colonies/100ml		
Total Phosphorous	000665		mg/l		
Oil & Grease	000550	X	<5.0 mg/l	VS	6/9/98
Chlorides	099016		mg/l		
Phenol	032730	X	<0.05 mg/l	KF	6/8/98
Cyanide	000722		mg/l		
Nitrate-Nitrite	000630		mg/l		
Alkalinity	000410		mg/l		
Hardness	000900		mg/l		

Remarks: _____

Lab Bench No.

1256

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 270
Cost Code: 3200

I. GENERAL INFORMATION:

Facility Name: Hercules

County Code: 0800

Discharge No: 002

NPDES Permit No.: 01830

Date Requested:

Sample Point Identification: Stormwater non-contact cooling water and 001

Requested By: Comp. Monit.

Data To: Charles Cook

Type of Sample: Grab: X Composite: Flow: Time: X Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Intermittant rain

Collected By: E. White

Where Taken: Ditch prior to leaving property

	Type	Parameters	Preservative	Date	Time
1.					
2.					
3.					
4.					
5.					
6.					

III. FIELD:

Analysis	Computer Req Code	Results	Analyst	Date
pH	000400 X	6.91	EW	1/27/98
D.O.	000300			
Temperature	000010 X	24°C	EW	1/27/98
Residual Chlorine	050060			
Flow	074060 X	0.85 MGD	EW	1/27/98

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other: Sunbelt

V. LABORATORY:

Received by: V. Stamps

Recorded by: Dot Lewis

Date: 1/28/98

Time: 1015

Date Sent to State Office: 2/13/98

VI. Remarks: No Sample

**BUREAU OF POLLUTION CONTROL
SAMPLE REQUEST FORM**

Lab Bench No.: 269
Cost Code: 3200

I. GENERAL INFORMATION:

Facility Name: Hercules

County Code: 0800

Discharge No: 001

Sample Point Identification: Process wastewater and stormwater

Requested By: Comp. Monit.

Type of Sample: Grab: X Composite: Flow:

NPDES Permit No.: 01830

Date Requested:

Data To: Charles Cook

Time: X Other:

II. SAMPLE IDENTIFICATION:

Environment Condition: Intermittant rain

Where Taken: 001 parshall flume

Collected By: E. White

	Type	Parameters	Preservative	Date	Time
1.	Comp.	BOD,SS	Cool	1/27/98	1100
2.	Comp.	TOC	5 ml H ₂ SO ₄	1/27/98	1100
3.	Grab	O&G	5 ml H ₂ SO ₄	1/27/98	1100
4.	Grab	Phenol	5 ml H ₂ SO ₄	1/27/98	1100
5.					
6.					

III. FIELD:

Analysis	Computer Req Code		Results	Analyst	Date
pH	000400	X	6.90/6.87	EW	1/26-27/98
D.O.	000300				
Temperature	000010	X	24°C	EW	1/27/98
Residual Chlorine	050060				
Flow	074060	X			

IV. TRANSPORTATION OF SAMPLE:

Bus:

RO Vehicle:

Other: Sunbelt

V. LABORATORY:

Received by: V. Stamps

Recorded by: Dot Lewis

Date: 1/28/98

Time: 1015

Date Sent to State Office: 2/13/98

VI. Remarks: No flow measurement meter being repaired

TARGET COMPOUND LISTE WET CHEMISTRY PARAMETERS

Lab Bench No.: 269

Analysis	Computer Req Code	Result	Analyst	Date Measured or Date Test Initiated
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BOD	000310	X	54.0 ^{317.0: 1.7A} 2322 mg/l	VS	1/28/98
COD	000340		mg/l		
TOC	000680	X	58.0 ^{911.40} 30.7 mg/l	VS	2/3/98
Suspended Solids	099000	X	39.0 ^{410.4} 1557 mg/l	VS	2/2/98
TKN	000625		mg/l		
Ammonia-N	000610		mg/l		
Fecal Coliform	074055		colonies/100ml		
Total Phosphorous	000665		mg/l		
Oil & Grease	000550	X	<9.0 mg/l	VS	2/4/98
Chlorides	099016		mg/l		
Phenol	032730	X	0.17 ^{1.205} 6.6 mg/l	KF	2/6/98
Cyanide	000722		mg/l		
Nitrate-Nitrite	000630		mg/l		
Alkalinity	000410		mg/l		

Remarks: _____



EPA

NPDES Compliance Inspection Report

Form Approved
OMB No. 4010-0002
Approval Expires
12-31-99

Section A: National Data System Coding

Form No. 1	NPDES	YR/MO/DAY	Inspection Type	Inspector	Facility Type	Sched'd	
N	MS0001830	98/10/27	SM		S	2	October
Inspected	Facility Evaluation Rating	BI	QA			Reserved	
	N	N	N				

Section B: Facility Data

Name and Location of Facility Inspected Hercules Incorporated Hattiesburg, Mississippi Forrest County		Entry Time: 1200	Permit Effective Date: 97/09/30
		Exit Time/Date: NA	Permit Expiration Date: 2002/09/29
Name of On-Site Representative(s) Walter Langhans	Title(s) Plant Manager		Phone No. (601) 584-3226
Name, Address of Responsible Official Walter Langhans 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937	Title Plant Manager		Phone No. (601) 584-3226
		Contacted YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated)

<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Pretreatment
<input type="checkbox"/> Construction & Maintenance	<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Laboratory
<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Sludge Disposal	<input type="checkbox"/> Facility Site Review
<input type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Other

Section D: Summary of Findings/Comments

The facility appears to be in compliance with permit conditions.

Name and Signatures of Inspectors J. Bonck	Agency/Office/Telephone Office of Pollution Control	Date
Signature of Reviewer Mohammad Yassin, PE	Agency/Office Office of Pollution Control	Date 12-4-98

Regulatory Office Use Only

Action Taken Report is sent to permittee.	Date 12-4-98	<input type="checkbox"/> Noncompliance <input checked="" type="checkbox"/> Compliance
----------------------------------------------	-----------------	------------------------------------------------------------------------------------------



United States Environmental Protection Agency, Washington, D.C., 20460

EPA

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0047
Approval Expires
7-31-88

Section A: National Data System Coding

Inspection Code	NPDES	YR/MO/DAY	Inspection Type	Inspector	Facility Type	Sched'd
N	MS0001830	98/14/09	C	S	2	Jan
Facility	Facility Evaluation Rating	SI	CA	Reserved		
N	N	N	N			

Section B: Facility Data

Name of Facility Inspector		Entry Time:	Permit Effective Date:
Hercules Incorporated		1:05 AM	97/09/30
Hattiesburg, Mississippi		Exit Time/Date:	Permit Expiration Date:
Forrest County		3:30 PM	2002/09/29
Name of Facility Representative(s)	Title(s)	Phone No.	
Walter Langhans	Plant Manager	(601) 584-3226	
Name, Address of Responsible Official		Title	
Walter Langhans		Plant Manager	
613 West 7th Street		Phone No.	Contacted
P. O. Box 1937		(601) 584-3226	YES NO x
Hattiesburg, MS 39403-1937			

Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated)

<input type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Pretreatment
<input type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Laboratory
<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Sludge Disposal	<input checked="" type="checkbox"/> Facility Site Review
<input type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Other

Section D: Summary of Findings/Comments

See Attached Narrative

Name & Signature of Inspectors	Agency/Office/Telephone	Date
Mohammad Yassin, PE	Office of Pollution Control	
Signature of Reviewer	Agency/Office	Date
	Office of Pollution Control	7-29-98

Regulatory Office Use Only

Action Taken	Date	<input type="checkbox"/> Noncompliance
Report is sent to permittee.	7-29-98	<input checked="" type="checkbox"/> Compliance

Hercules Incorporated
Hattiesburg, Mississippi
NPDES Permit NO. MS0001830
CEI, April 1998

ON April 13, 1998, I traveled to the referenced facility to conduct a CEI. M Walter Langhans and Mr. Randy Harvell were present during this inspection.

Permit;

A copy of the permit was available for review during the inspection.

Operation & Maintenance;

Hercules Inc. is located on west 7th street, approximately 2 miles east of Hwy 4 in Hattiesburg, Forrest County, Mississippi. It is about 200 acres in size with a restricted access by a 7-ft high fence and a gate. The facility makes two types of chemical resin extracted from tree rosin and paper chemicals. The treatment system at the facility consists of settling ponds, pH adjustment, treatment activated carbon, and discharge into a nearby unnamed stream. There was so noticeable sulfur like smell near the ponds, otherwise the system was operating properly.

Flow Measurement;

Two Parshall flumes were used to calculate the flow at the facility.

Records / reports;

The DMR, pH reading, calibration, chain of custody, and other documentation, were available for review during this inspection.

Sludge Disposal;

Sludge from the settling ponds was being disposed of on site as non hazardous waste.

Self Monitoring;

There is a continuous reading of pH at the outfall. Hercules has been receiving and treating Zeon Chemical waste for eight years, a meter is installed to calculate the flow and weekly samples are taken to analyze for contaminants.

Laboratory;

All the samples appear to be collected and analyzed properly.



EPA

United States Environmental Protection Agency, Washington, D.C., 20460

NPDES Compliance Inspection Report

Form Approved
OMB No.2040-0003
Approval Expires
7-31-85

Section A: National Data System Coding

Inspection Code	NPDES	YR/MO/DAY	Inspection Type	Inspector	Facility Type	Sched'd
N	MS0001830	98/06/17	SM	S	2	June
Reserved	Facility Evaluation Rating	BI	QA	Reserved		
N	N	N	N			

Section B: Facility Data

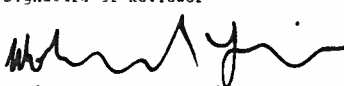
Name and Location of Facility Inspected	Entry Time:	Permit Effective Date:
Hercules Incorporated Hattiesburg, Mississippi Forrest County	1310	97/09/30
	Exit Time/Date:	Permit Expiration Date:
	NA	2002/09/29
Name(s) of On-Site Representative(s)	Title(s)	Phone No(s)
Walter Langhans	Plant Manager	(601)584-3226
Name, Address of Responsible Official	Title	
Walter Langhans 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937	Plant Manager	
	Phone No.	Contacted YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
	(601)584-3226	

Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Pretreatment
<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Laboratory
<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Sludge Disposal	<input type="checkbox"/> Facility Site Review
<input type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Other

Section D: Summary of Findings/Comments

The facility appears to be in compliance with permit conditions.

Names and Signatures of Inspectors	Agency/Office/Telephone	Date
E. White	Office of Pollution Control	98/06/17
Signature of Reviewer	Agency/Office	Date
 Mohammad Yassin, PE	Office of Pollution Control	98-08-04

Regulatory Office Use Only

Action Taken	Date	<input type="checkbox"/> Noncompliance <input checked="" type="checkbox"/> Compliance
Report is sent to permittee.	98/08/03	



United States Environmental Protection Agency, Washington, D.C. 20460

EPA

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires
7-31-85

Section A: National Data System Coding

Transaction Code	NPDES	YR/MO/DAY	Inspection Type	Inspector	Facility Type	Sched'd
N	MS0001830	98/06/17	SM	S	2	June
Reserved	Facility Evaluation Rating	BI	QA		Reserved	
	N	N	N			

Section B: Facility Data


Name and Location of Facility Inspected	Entry Time:	Permit Effective Date:
Hercules Incorporated Hattiesburg, Mississippi Forrest County	1310	97/09/30
	Exit Time/Date:	Permit Expiration Date:
	NA	2002/09/29
Name(s) of On-Site Representative(s)	Title(s)	Phone No(s)
Walter Langhans	Plant Manager	(601) 584-3226
Name, Address of Responsible Official	Title	
Walter Langhans 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937	Plant Manager	
	Phone No.	Contacted
	(601) 584-3226	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>

Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Laboratory
<input checked="" type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Sludge Disposal	<input checked="" type="checkbox"/> Facility Site Review
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Other

Section D: Summary of Findings/Comments

The facility appears to be in compliance with permit conditions.

Names and Signatures of Inspectors	Agency/Office/Telephone	Date
E. White	Office of Pollution Control	98/06/17
Signature of Reviewer	Agency/Office	Date
 Mohammad Yassin, PE	Office of Pollution Control	98/06/29
Regulatory Office Use Only		
Action Taken	Date	<input type="checkbox"/> Noncompliance <input checked="" type="checkbox"/> Compliance
Report is sent to permittee.	98/06/29	

RCRA INSPECTION REPORT

1) Inspector and Author of Report

Carlos E. Merizalde, E.I.T.
Environmental Engineer

2) Facility Information

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, Mississippi 39403-1937
EPA ID No.: MSD 008 182 081
Telephone number: (601) 545-3450

3) Contact Official

Mr. Lloyd D. Madden, Safety & Training

4) Inspection Participants

Carlos E. Merizalde,	U.S. Environmental Protection Agency (EPA),
	Region 4, South Enforcement & Compliance Section
Mohammad Yassin,	Mississippi Department of Environmental Quality (MDEQ)
	Environmental Compliance and Enforcement Division
Lloyd D. Madden,	Hercules, Inc.

5) Date of Inspection

June 9, 1998

6) Applicable Regulations

RCRA Sections 3005 and 3007, 40 Code of Federal Regulations (CFR) Parts 260-270, and Part 279.

7) Purpose of Inspection

This was a Compliance Evaluation Inspection (CEI) conducted at Hercules, Inc. (the facility), in order to determine the facility's compliance with the applicable regulations cited above.

8) Facility Description Process Overview

Hercules owns a facility which is registered as a *Large Quantity Generator (LQG)* of hazardous waste. The facility is located in Hattiesburg, Forrest County, in southwestern Mississippi. The facility property is approximately 200 acres with access restricted by a seven foot fence, a front gate, and a guard. Hercules has operated since 1922 and currently operates 24 hours a day and seven days a week. The facility employs approximately 150 people. It is one of forty-five Hercules manufacturing facilities worldwide.

The facility includes the following operational areas:

- Office Building
- Warehouse
- Carpenter/Paint Shop
- Experimental Laboratory
- Wastewater Treatment Plant
- Reactor Tanks
- Mobile Equipment Area
- Auto Shop
- Electric Shop
- Railroad Car Area
- Hazardous Waste Storage Area
- Raw Materials Storage Tanks
- Product Storage Tanks, etc.

Hercules has made resin chemicals from the beginning of operation and started making paper chemicals in 1960. Paper chemicals are used by pulping mills to give paper different qualities, such as wet strength. Resin, or rosin based, chemicals are used in a variety of products, such as, film, paint, golf balls, automotive coatings, and chewing gum.

From 1922 to 1986 the rosin was extracted from tree stumps and processed on-site. The stumps were cut into pieces and shredded and solvents were used to extract the rosin. Currently, the rosin is brought in from the Hercules facility located in Brunswick, Georgia. The rosin is hydrogenated and then processed into resin. Paper chemicals are made in batch reactors under atmospheric pressure. EPI chloride, the primary ingredient, is mixed

with other chemicals in order to achieve different properties. The final product is pumped from the bottom of the reactors into storage tanks.

Wastewater is treated on-site using an oil/water separator, dissolved air flotation, neutralization, and activated carbon. After treatment the water is discharged off-site via culvert and under a National Pollutant Discharge Elimination System (NPDES) Permit.

The facility generates primarily waste solvents, mainly toluene and acetone, (EPA hazardous waste codes D001, F003, F005), paint related waste generated during painting operations (F001, F003, F005, etc.), fluorescent light bulbs (D009), NiCad batteries (D006), lead batteries (D008), etc. Sometimes the paints and contaminated material will exceed the toxicity characteristic for cadmium (D006), chromium (D007), lead (D008), etc.

9) Findings

On June 9, 1998, inspectors from MDEQ and EPA met with representatives of Hercules, presented their credentials and briefed them on the formalities of the inspection and the type of activities it would cover.

90-Day Hazardous Waste Storage Area.

This is a roofed concrete structure located on the southeast side of the facility. The building has an area of approximately 800 square feet. On the front end of the storage area there is a concrete platform raised 2 feet high. A trench runs along opposite sides of this platform. The other end of the storage area is level with the ground and has approximately eighteen (18) inch walls on three sides and the platform makes up the fourth side. At the time of the inspection, the following hazardous wastes were observed in this area: two (2) fifty-five (55) gallon drums containing waste flammable solids contaminated with toluene (EPA hazardous waste codes D001 and F005). These drums were closed, labeled "Hazardous Waste", in good condition, and had a "06/03/98" start accumulation date stamped on; three (3) fifty-five (55) gallon drums containing waste flammable liquids, toluene and acetone (EPA hazardous waste codes D001, F005, and F003). These drums were closed, labeled "Hazardous Waste", in good condition, and had "04/18/98", "04/23/98", and "04/29/98", start accumulation dates stamped on. The building, and the facility in general, are surrounded by a complex system of fire houses, fire hydrants, and portable fire monitors. All facility personnel carry two-way radios as part of the communication system.

Satellite Accumulation Areas.

At the time of the inspection, the facility was operating three (3) satellite accumulation areas. The following table details the areas visited during the inspection:

<i>Areas</i>	<i>Hazardous Wastes Observed</i>
Experimental Laboratory	<p>Outside building: one (1) fifty-five (55) gallon drum containing spent solvent (toluene) (D001, F005). Closed, labeled, electrically grounded and in good condition.</p> <p>Inside building: the facility keeps several small accumulation containers for collection of spent solvents as part of its laboratory activities. At the time of the inspection no hazardous waste was observed here.</p>
Carpenter/Paint Shop	<p>One (1) fifty-five (55) gallon drum containing waste solvent (D001, D006, D007, D008, F001, F003, F005). Closed, electrically grounded, labeled, and in good condition.</p> <p>One (1) fifty-five (55) gallon drum containing waste paint (D001, D006, D007, D008). The drum was OPEN and labeled. This constitutes a violation of Federal Regulations. See below for the description of this violation.</p> <p>One (1) forty (40) gallon drum containing scrap aerosol paint cans (D001, D006, D007, D008). Closed and labeled.</p>
Mobile Equipment Area	At the time of the inspection no hazardous waste was observed here.
Raw Material and Product Storage Tanks Areas	At the time of the inspection no hazardous waste was observed here.
Wastewater Plant Area	At the time of the inspection no hazardous waste was observed here.

<i>Areas</i>	<i>Hazardous Wastes Observed</i>
Electric Shop	<p>One (1) forty (40) gallon drum containing fluorescent light bulbs (D009) for recycling. Closed and labeled.</p> <p>One (1) twenty (20) gallon drum containing NiCad batteries (D006) for recycling. Closed and labeled.</p> <p>One (1) box with mercury containing light bulbs (D009) for recycling. Closed and labeled.</p> <p>One (1) forty (40) gallon drum containing scrap aerosol paint cans (D001, D006, D007, D008). Closed and labeled.</p>
Auto Shop	<p>No hazardous waste was observed. One (1) 275 gallon tank containing used oil destined for recycling. Closed, labeled, and in good condition.</p> <p>Lead batteries (D009) for recycling</p> <p>One (1) Safety-Kleen parts washer</p> <p>Used oil filters are gravity drained for several days.</p>

a. Pursuant to: 40 CFR 265.173(a)

A container holding hazardous waste must always be closed during storage except when it is necessary to add or remove waste.

Hercules failed to keep closed one (1) fifty-five (55) gallon drum containing hazardous waste paint, located in the Carpenter/Paint Shop, in which waste was not being added or removed.

Document Review.

The following documents were reviewed for the purpose of establishing compliance status of Hercules:

- Personnel training records
- Weekly Hazardous Waste Inspection Records
- Manifests and Land Ban Notification Forms
- Waste Minimization Plan
- 1997 Hazardous Waste Report
- Contingency Plan

Upon review, all documents were in compliance, except for the facility's Contingency Plan. The following deficiency was noted regarding the plan.

b. Pursuant to: 40 CFR § 265.52(e)

The Contingency Plan must include a list of all emergency equipment at the facility, where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.


Hercules failed to provide the location, physical description, and a brief outline of the capabilities of each item on its list of emergency equipment in the facility's Contingency Plan.

10) Conclusions

Hercules is in violation of the applicable *Standards for Generators of Hazardous Waste* contained in 40 CFR Parts 262 and 265 by reference. The findings, as outlined in sections 9.a. and 9.b., are violations of the U.S. Environmental Protection Agency.

At the time of the inspection, the Auto Shop manager stated that used oil filters are only gravity drained. EPA recommends having these filters gravity hot-drained and a hole punched in their domes for proper drainage of the used oil.

11) Signed




Carlos E. Merizalde
Environmental Engineer, E.I.T.
South Enforcement and Compliance Section



Date

12) Approved



Jeffrey T. Pallas, Chief
South Enforcement and Compliance Section
RCRA Enforcement and Compliance Branch



Date



EPA

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0033
Approval Expires
7-31-85

Section A: National Data System Coding

Transaction Code	NPDES	YR/MO/DAY	Inspection Type	Inspector	Facility Type	Scheduled
N	MS0001830	98/13/04	SM	S	2	Mar
Reserved	Facility Evaluation Rating	BI	QA	Reserved		
	N	N	N			

Section B: Facility Data


Name and Location of Facility Inspected Hercules Incorporated Hattiesburg, Mississippi Forrest County	Entry Time: 10:15 AM	Permit Effective Date: 97/09/30
	Exit Time/Date: NA	Permit Expiration Date: 2002/09/29
Name(s) of On-Site Representative(s) Walter Langhans	Title(s) Plant Manager	Phone No(s) (601) 584-3226
Name, Address of Responsible Official: Walter Langhans 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937	Title Plant Manager	
	Phone No. (601) 584-3226	Contacted YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>

Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Pretreatment
<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Laboratory
<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Sludge Disposal	<input type="checkbox"/> Facility Site Review
<input type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Other

Section D: Summary of Findings/Comments

The facility appears to be in compliance with permit conditions.

Names and Signatures of Inspectors E. White	Agency/Office/Telephone Office of Pollution Control	Date 1/28/98
Signature of Reviewer  Mohammad Yassin, PE	Agency/Office Office of Pollution Control	Date 4/30/98

Regulatory Office Use Only

Action Taken Report is sent to permittee.	Date 4/15/98	<input type="checkbox"/> Noncompliance <input checked="" type="checkbox"/> Compliance
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EPA

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0063
Approval Expires
7-31-88

Section A: National Data System Coding

Inspection Date	NPDES	YR/MO/DAY	Inspection Type	Inspector	Facility Type	Sched'd
N	MS0001830	98/13/04	C	S	2	Jan
Facility	Facility Evaluation Rating	E1	2A	Reserved		
N	N	N	N			

Section B: Facility Data

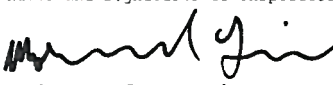
Name and Location of Facility Inspected Hercules Incorporated Hattiesburg, Mississippi Forrest County	Entry Time: 10:40 AM	Permit Effective Date: 97/09/30
	Exit Time/Date: 2:30 PM	Permit Expiration Date: 2002/09/29
Name of On-Site Representative(s) Walter Langhans	Title(s) Plant Manager	Phone No(s) (601) 584-3226
Name, Address of Responsible Official Walter Langhans 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937	Title Plant Manager	
	Phone No. (601) 584-3226	Contacted YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>

Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated)

<input checked="" type="checkbox"/> Permit Operations & Maintenance Compliance Schedules Effluent/Receiving Waters	<input checked="" type="checkbox"/> Flow Measurement <input checked="" type="checkbox"/> Records/Reports <input checked="" type="checkbox"/> Sludge Disposal <input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Pretreatment <input checked="" type="checkbox"/> Laboratory <input checked="" type="checkbox"/> Facility Site Review <input checked="" type="checkbox"/> Other
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Section D: Summary of Findings/Comments

See Attached Narrative

Name and Signatures of Inspectors  Mohammad Yassin, PE	Agency/Office/Telephone Office of Pollution Control	Date 4/15/98
Signature of Reviewer	Agency/Office Office of Pollution Control	Date

Regulatory Office Use Only

Action Taken Report is sent to permittee.	Date 4/15/98	<input type="checkbox"/> Noncompliance <input checked="" type="checkbox"/> Compliance
----------------------------------------------	-----------------	------------------------------------------------------------------------------------------

Hercules Incorporated
Hattiesburg, Mississippi
NPDES Permit NO. MS0001830
CEI, April 1998

ON April 13, 1998, I traveled to the referenced facility to conduct a CEI. Mr. Walter Langhans and Mr. Randy Harvell were present during this inspection.

Permit;

A copy of the permit was available for review during the inspection.

Operation & Maintenance;

Hercules Inc. is located on west 7th street, approximately 2 miles east of Hwy 49 in Hattiesburg, Forrest County, Mississippi. It is about 200 acres in size with a restricted access by a 7-ft high fence and a gate. The facility makes two types of chemical resin extracted from tree rosin and paper chemicals. The treatment system at the facility consists of settling ponds, pH adjustment, treatment with activated carbon, and discharge into a nearby unnamed stream. There was some noticeable sulfur-like smell near the ponds, otherwise the system was operating properly.

Flow Measurement;

Two Parshall flumes were used to calculate the flow at the facility.

Records / reports;

The DMR, pH reading, calibration, chain of custody, and other documentation, were available for review during this inspection.

Sludge Disposal;

Sludge from the settling ponds was being disposed of on site as non-hazardous waste.

Self Monitoring;

There is a continuous reading of pH at the outfall. Hercules has been receiving and treating Zeon Chemical waste for eight years, a meter is installed to calculate the flow and weekly samples are taken to analyze for contaminants.

Laboratory;

All the samples appear to be collected and analyzed properly.



EPA

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires
7-31-85

Section A: National Data System Coding

Transaction Code	NPDES	YR/MO/DAY	Inspection Type	Inspector	Facility Type	Sched'd
N	MSP091286	98/13/04	3	S	2	Jan
Reserved	Facility Evaluation Rating	BI	QA	Reserved		
N	N	N	N			

Section B: Facility Data


Name and Location of Facility Inspected Hercules Incorporated Hattiesburg, Mississippi Forrest County	Entry Time: 10:40 AM	Permit Effective Date: 97/09/30
	Exit Time/Date: 2:30 PM	Permit Expiration Date: 2002/09/29
Name(s) of On-Site Representative(s) Walter Langhans	Title(s) Plant Manager	Phone No(s) (601)584-3226
Name, Address of Responsible Official Walter Langhans 613 West 7th Street P. O. Box 1937 Hattiesburg, MS 39403-1937	Title Plant Manager	
	Phone No. (601)584-3226	Contacted YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>

Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Operations & Maintenance	<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Laboratory
<input checked="" type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Sludge Disposal	<input checked="" type="checkbox"/> Facility Site Review
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Other

Section D: Summary of Findings/Comments

See Attached Narrative

Names and Signatures of Inspectors  Mohammad Yassin, PE	Agency/Office/Telephone Office of Pollution Control	Date 4/15/98
Signature of Reviewer	Agency/Office Office of Pollution Control	Date

Regulatory Office Use Only

Action Taken: Report is sent to permittee.	Date 4/15/98	<input type="checkbox"/> Noncompliance <input checked="" type="checkbox"/> Compliance
-----------------------------------------------	-----------------	------------------------------------------------------------------------------------------

Hercules Incorporated
Hattiesburg, Mississippi
NPDES Permit NO. MS0001830
CEI, April 1998

ON April 13, 1998, I traveled to the referenced facility to conduct a CEI. Mr. Walter Langhans and Mr. Randy Harvell were present during this inspection.

Permit;

A copy of the permit was available for review during the inspection.

Operation & Maintenance;

Hercules Inc. is located on west 7th street, approximately 2 miles east of Hwy 49 in Hattiesburg, Forrest County, Mississippi. It is about 200 acres in size with a restricted access by a 7-ft high fence and a gate. The facility makes two types of chemical resin extracted from tree rosin and paper chemicals. The treatment system at the facility consists of settling ponds, pH adjustment, treatment: activated carbon, and discharge into a near by unnamed stream. There was some noticeable sulfur like smell near the ponds, otherwise the system was operating properly.

Flow Measurement;

Two Parshall flumes were used to calculate the flow at the facility.

Records / reports;

The DMR, pH reading, calibration, chain of custody, and other documentation, were available for review during this inspection.

Sludge Disposal;

Sludge from the settling ponds was being disposed of on site as non hazardous waste.

Self Monitoring;

There is a continuous reading of pH at the outfall. Hercules has been receiving and treating Zeon Chemical waste for eight years, a meter is installed to calculate the flow and weekly samples are taken to analyze for contaminants.

Laboratory;

All the samples appear to be collected and analyzed properly.



United States Environmental Protection Agency, Washington, D.C., 20460

EPA NPDES Compliance Inspection ReportForm Approved
OMB No.2040-0003
Approval Expires 7-31-85

Transaction Code	NPDES	YR/MO/DAY	Inspection Type	Inspector	Facility Type	Sched'd
N	MS0001830	97/03/31	SM	S	2	MAR
Reserved	Facility Evaluation Rating		BI	QA		Reserved
			N	N		

Name and Location of Facility Inspected		Entry Time:	Permit Effective Date:
Hercules Incorporated 613 West 7th Street Hattiesburg, MS 39401 Forrest County		2:00 pm	10/22/91
		Exit Time/Date:	Permit Expiration Date:
			10/21/96
Name(s) of On-Site Representative(s)		Title(s)	Phone No(s)
Mr. Charles Jordan		Environmental Coordinator	(601) 545-3450
Name,Address of Responsible Official		Title	
Mr. Gerald Burch Hercules Incorporated P.O. Box 1937 Hattiesburg, MS 39401-1937		Plant Manager	
		Phone No.	Contacted
		(601) 762-0870	YES _____ NO _____

Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Operations & Maintenance
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Sludge Disposal
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Other

Outfall 002	Permit Limit (daily max.)		Sampling Results (daily max.)
Parameter	mg/l	lbs/day	mg/l
BOD	-----	-----	29.0
TSS	-----	-----	4.0
TOC	-----	-----	19.0
Oil & Grease	-----	-----	<5.0
Phenol	-----	-----	<0.05
Temperature	41°C	-----	30.1°C
pH	6.0 min. - 9.0 max. S.U.		7.3 S.U.
Flow	report (mgd)		1.7 mgd

Names and Signatures of Inspectors	Agency/Office/Telephone	Date
Jeff Bonck	MDEQ/OPC/SRO	3/31/97
Errol White	MDEQ/OPC/SRO	3/31/97
Signature of Reviewer	Agency/Office	Date
Becky Ornelas	MDEQ/OPC 961-5580	5/1/97

Action Taken	Date	Noncompliance <input checked="" type="checkbox"/> Compliance
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United States Environmental Protection Agency, Washington, D.C., 20460

EPA NPDES Compliance Inspection ReportForm Approved
OMB No.2040-0003
Approval Expires 7-31-85

Transaction Code	NPDES	YR/MO/DAY	Inspection Type	Inspector	Facility Type	Sched'd
N	MS0001830	97/02/18	C	S	2	MAR
Reserved	Facility Evaluation Rating		BI		QA	Reserved
			N		N	

Name and Location of Facility Inspected

Hercules Incorporated
Hattiesburg, MS 39401
Forrest County

613 West 7th Street

Entry Time:

9:35 am

Permit Effective Date:

10/22/91

Exit Time/Date:

11:35 pm

Permit Expiration Date:

10/21/96

Name(s) of On-Site Representative(s)

Mr. Charles Jordan

Title(s)

Environmental Coordinator

Phone No(s)

(601) 545-3450

Name, Address of Responsible Official

Mr. Gerald Burch
Hercules Incorporated
P.O. Box 1937
Hattiesburg, MS 39401-1937

Title

Plant Manager

Phone No.

(601) 545-3450

Contacted

YES___ NO X

Section C: Areas Evaluated During Inspection (S-Satisfactory, M-Marginal, U-Unsatisfactory, N-Not Evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Pretreatment	<input checked="" type="checkbox"/> Operations & Maintenance
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Sludge Disposal
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Self-Monitoring Program	<input checked="" type="checkbox"/> Other

- A transcribing error was found in November of 1996. The monthly maximum limit for phenols was reported as 4.3 lbs/day. The maximum for November was 5.5 lbs/day. A corrected Discharge Monitoring Report and explanation has already been received.

Names and Signatures of Inspectors

Becky Ornelas

Becky Ornelas

Agency/Office/Telephone

Office of Pollution Control

961-5580

Date

3/17/97

Signature of Reviewer

Wm. Allyn Lytle

Agency/Office

MDEQ/OPC

Date

3-17-97

Action Taken

Date

Noncompliance
Compliance

NPDES Compliance Inspection Summary

Permit: A copy of the currently effective permit was readily available and the facility is as described by the permit.

Records/Reports: The documentation for analyzing the samples was accurate. The conversions are done on a spreadsheet. The records are maintained for a minimum of three (3) years. Phenols are analyzed by Bonner Analytical Testing Company, at 2703 Oak Grove Road, Hattiesburg, MS 39402. The contact person at Bonner Analytical is Michael S. Bonner, Ph. D. and can be reached at (601) 264-2854. Analytical results were consistent with data reported on the DMRs.

Facility Site Review: Hercules Inc. is a diversified chemical manufacturer of modified resins and resins solutions, paper chemicals, polyamides, ketene dimer, rosin emulsions, and wax emulsion. There are two outfalls. Outfall 001 discharges process wastewater and treated stormwater. The treatment for this outfall is a sedimentation basin, dissolved air floatation, pH adjustment using caustic, neutralization, equalization, and three carbon adsorption towers. Outfall 002 is a total facility discharge containing process wastewater, non-contact cooling water, and stormwater runoff. There is no treatment for this outfall.

Flow Measurement: The flow measurement used are Sonic totalizers and flumes. The flowmeter is calibrated once a year.

Laboratory: The permittee employs Bonner Analytical Testing Company to test phenols. The other parameters are tested at the in-house laboratory.

Effluent: The wastewater discharges into an unnamed tributary of the Bowie River and seemed to be in good condition with no foam, floating solids, or discoloration.

Self-Monitoring Program: Grab and composite samples are collected for analysis in accordance with the requirements of the permit. A transcribing error was found in November of 1996. The monthly maximum limit for phenols was reported as 4.3 lbs/day. The maximum for November was 5.5 lbs/day. A corrected Discharge Monitoring Report and explanation has already been received.

Operations & Maintenance: Based upon observations during the inspection, the wastewater treatment system is operated and maintained effectively.

COMPLIANCE INSPECTION

Permit Verification

1. Inspection observations verify information contained in permit.
Yes X No N/A
2. Current copy of permit is onsite.
Yes X No N/A
3. Name and mailing address of permittee are correct.
Yes X No N/A
4. Facility is as described in permit.
Yes X No N/A
5. Notification was given to EPA/State of new, different, or increased discharges.
Yes No N/A X
6. Accurate records of influent volume maintained, when appropriate.
Yes No N/A X
7. Number and location of receiving waters are correct.
Yes X No N/A
8. All discharges are permitted.
Yes X No N/A

Recording Keeping and Reporting

1. Records and reports are maintained as required by permit.
Yes X No N/A
2. All required information is available, complete, and current.
Yes X No N/A
3. Information is maintained for 3 years.
Yes X No N/A
4. If the facility monitors more frequently than required by permit (using approved methods), are these results reported?
Yes No N/A X
5. Analytical results are consistent with data reported on DMRs.
Yes X No N/A
6. Sampling and analyses data are adequate and include:
 - a. Dates, times, and location of sampling
Yes X No N/A
 - b. Name of individual performing sampling
Yes X No N/A
 - c. Analytical methods and techniques
Yes X No N/A

- d. Results of analyses and calibration
Yes X No _____ N/A _____
- e. Dates of analyses
Yes X No _____ N/A _____
- f. Name of person performing analyses
Yes X No _____ N/A _____
- g. Instantaneous flow at grab sample stations
Yes _____ No _____ N/A X
7. Monitoring records are adequate and include:
a. Flow, pH, DO, etc., as required by permit
Yes X No _____ N/A _____
- b. Monitoring charts kept for 3 years
Yes X No _____ N/A _____
- c. Flowmeter calibration records kept
Yes X No _____ N/A _____
8. Laboratory equipment calibration and maintenance records are adequate.
Yes X No _____ N/A _____

Compliance Schedule Statue Review

1. Permittee is meeting compliance schedule.
Yes _____ No _____ N/A X
2. Permittee has obtained necessary approvals to begin construction.
Yes _____ No _____ N/A X
3. Contracts for engineering services have been executed.
Yes _____ No _____ N/A X
4. Design plans and specifications are completed.
Yes _____ No _____ N/A X
5. Construction has begun.
Yes _____ No _____ N/A X
6. Construction is on schedule.
Yes _____ No _____ N/A X
7. Equipment acquisition is on schedule.
Yes _____ No _____ N/A X
8. Construction has been completed.
Yes _____ No _____ N/A X
9. Startup has begun.
Yes _____ No _____ N/A X
10. Permittee has requested an extension of time.
Yes _____ No _____ N/A X
11. Permittee has met compliance schedule.
Yes _____ No _____ N/A X

Operation and Maintenance Evaluation

1. Treatment units are properly operated and maintained.
Yes X No _____ N/A _____
2. Standby power or other equivalent provision is provided.
Yes _____ No _____ N/A X
3. Adequate alarm system for power or equipment failures is available.
Yes X No _____ N/A _____
4. Sludge disposal procedures are appropriate:
 - a. Disposal of sludge according to regulations
Yes X No _____ N/A _____
 - b. State approval for sludge disposal received.
Yes X No _____ N/A _____
5. All treatment units, other than backup units, are in service.
Yes X No _____ N/A _____
6. Procedures for facility operation and maintenance are followed.
Yes X No _____ N/A _____
7. Sufficient sludge is disposed of to maintain treatment process equilibrium.
Yes X No _____ N/A _____
8. Organizational Plan (chart) for operation and maintenance is provided.
Yes X No _____ N/A _____
9. Operating schedules are established.
Yes X No _____ N/A _____
10. Emergency plan for treatment control established.
Yes X No _____ N/A _____
11. Maintenance record system exists and includes:
 - a. As-built drawings
Yes X No _____ N/A _____
 - b. Shop drawings
Yes X No _____ N/A _____
 - c. Construction specifications
Yes X No _____ N/A _____
 - d. Maintenance history
Yes X No _____ N/A _____
 - e. Maintenance costs
Yes X No _____ N/A _____
 - f. Repair history
Yes X No _____ N/A _____
 - g. Records of equipment repair and timely return to service
Yes X No _____ N/A _____
12. Adequate number of qualified operators on-hand.
Yes X No _____ N/A _____

13. Established procedures are available for training new operators.
Yes X No _____ N/A _____
14. Adequate spare parts and supplies inventory are maintained.
Yes X No _____ N/A _____
15. Instruction files are kept for operation and maintenance of each item of major equipment.
Yes X No _____ N/A _____
16. Operation and maintenance manual is available.
Yes X No _____ N/A _____
17. Regulatory agency is notified of any bypassing.
Yes X No _____ N/A _____
18. a. Hydraulic overflows and/or organic overloads are experienced.
Yes X No _____ N/A _____
- b. Untreated bypass discharge occurs during power failure.
Yes _____ No X N/A _____
- c. Untreated overflows occurred since last inspection.
Yes _____ No X N/A _____
- d. Flows were observed in overflow or bypass channels.
Yes _____ No X N/A _____
- e. Checking for overflows is performed routinely.
Yes X No _____ N/A _____
- f. Overflows are reported to EPA or to the appropriate State agency as specified in the permit.
Yes X No _____ N/A _____

Permittee Sampling Evaluation

1. Samples taken at sites specified in permit.
Yes X No _____ N/A _____
2. Locations adequate for representative samples.
Yes X No _____ N/A _____
3. Flow proportioned samples obtained when required by permit.
Yes _____ No _____ N/A X
4. Sampling and analysis completed on parameters specified by permit.
Yes X No _____ N/A _____
5. Sampling and analysis done in frequency specified by permit.
Yes X No _____ N/A _____
6. Permittee uses method of sample collection required by permit.
Yes X No _____ N/A _____
7. Sample collection procedures adequate:
- a. Samples refrigerated during compositing.
Yes X No _____ N/A _____
- b. Proper preservation techniques used.
Yes X No _____ N/A _____

c. Containers and sample holding time before analyses conform to 40 CFR Part 136.3
Yes ☒ No ☐ N/A ☐

d. Samples analyzed in timeframe needed (same day).
Yes ☒ No ☐ N/A ☐

8. Monitoring and analyses performed more often than required by permit; if so, results reported in permittee's self-monitoring report.
Yes ☐ No ☐ N/A ☒

9. Samples contain chlorine.
Yes ☐ No ☒ N/A ☐

10. Contract laboratory used for sample analysis.
Yes ☒ No ☐ N/A ☐

Sampling Inspection Procedures and Observations

1. Grab samples obtained.
Yes ☒ No ☐ N/A ☐

2. Composite sample obtained.
Yes ☒ No ☐ N/A ☐

Compositing Frequency: as by permit Preservation: as by permit

3. Sample refrigerated during compositing.
Yes ☒ No ☐ N/A ☐

4. Flow proportioned sample obtained.
Yes ☒ No ☐ N/A ☐

5. Sample obtained from facility sampling device.
Yes ☒ No ☐ N/A ☐

6. Sample representative of volume and nature of discharge.
Yes ☒ No ☐ N/A ☐

7. Sample split with permittee.
Yes ☒ No ☐ N/A ☐

8. Chain-of-custody procedures employed.
Yes ☒ No ☐ N/A ☐

9. Samples collected in accordance with permit.
Yes ☒ No ☐ N/A ☐

10. Excessive foam, grease, floating solids observed at the outfall.
Yes ☐ No ☒ N/A ☐

General

1. Secondary containment for oil/chemical storage tanks used at facility.
Yes X No _____ N/A _____
2. a. Primary flow measuring device properly installed and maintained.
Yes X No _____ N/A _____
b. Flow measured at each outfall?
Yes X No _____ N/A _____
c. Is there a straight length of pipe or channel before and after the flowmeter of at least 5 to 20 diameters?
Yes X No _____ N/A _____
d. If a magnetic flowmeter is used, are there sources of electric noise in the near vicinity?
Yes _____ No _____ N/A X
e. Is the magnetic flowmeter properly grounded?
Yes _____ No _____ N/A X
f. Is the full pipe requirement met?
Yes X No _____ N/A _____

Number of outfalls: 2 outfalls

3. a. Flow records properly kept.
Yes X No _____ N/A _____
b. All charts maintained in a file.
Yes X No _____ N/A _____
c. All calibration data entered into a log book.
Yes X No _____ N/A _____
4. Actual discharged flow measured.
Yes X No _____ N/A _____
5. Effluent flow measured after all return lines.
Yes X No _____ N/A _____
6. Secondary instruments (totalizers, recorders, etc.) properly operated and maintained.
Yes X No _____ N/A _____
7. Spare parts stocked.
Yes X No _____ N/A _____
8. Effluent loadings calculated using effluent flow.
Yes X No _____ N/A _____

Flumes

1. Flow entering flume reasonably well-distributed across the channel and free of turbulence, boils, or other disturbances.
Yes X No _____ N/A _____
2. Cross-sectional velocities at entrance relatively uniform.
Yes X No _____ N/A _____
3. Flume clean and free of debris and deposits.
Yes X No _____ N/A _____

4. All dimensions of flume accurate and level.
Yes X No N/A
5. Side walls of flume vertical and smooth.
Yes X No N/A
6. Sides of flume throat vertical and parallel.
Yes X No N/A
7. Flume head being measured at proper location.
Yes X No N/A
8. Measurement of flume head zeroed to flume crest.
Yes X No N/A
9. Flume properly sized to measure range of existing flow.
Yes X No N/A
10. Flume operating under free-flow conditions over existing range of flows.
Yes X No N/A
11. Flume submerged under certain flow conditions.
Yes No X N/A
12. Flume operation invariably free-flow.
Yes X No N/A

Weirs

1. What type of weir is being used?
Yes No N/A X
2. Weir exactly level.
Yes No N/A X
3. Weir plate plumb and its top and edges sharp and clean.
Yes No N/A X
4. Downstream edge of weir is chamfered at 45°.
Yes No N/A X
5. Free access for air below the nappe of the weir.
 - a. Samples refrigerated during compositing.
Yes No N/A X
6. Upstream channel of weir straight for at least four times the depth of water level and free from disturbances.
Yes No N/A X
7. Distance from sides of weir to side of channel at least 2H.
Yes No N/A X

8. Area of approach channel at least (8 x nappe area) for upstream distance of 15H.

Yes _____ No _____ N/A X

9. If not, is velocity of approach too high?

Yes _____ No _____ N/A X

10. Head measurements properly made by facility personnel.

Yes _____ No _____ N/A X

11. Leakage does not occur around weir.

Yes _____ No _____ N/A X

12. Proper flow tables used by facility personnel.

Yes _____ No _____ N/A X

Other Flow Devices

1. Type of flowmeter used: Totalizer

2. What are the most common problems that the operator has had with the flowmeter? None

3. Measured wastewater flow: N/A mgd; Recorded flow: _____
Error %: _____

Calibration and Maintenance

1. Flow totalizer properly calibrated.

Yes X No _____ N/A _____

2. Frequency of routine inspection by proper operator: 1 /day.

3. Measured wastewater flow: N/A mgd; Recorded flow: _____
Error %: _____

4. Flowmeter calibration records kept.

Yes X No _____ N/A _____

Frequency of flowmeter calibration: 1 /~~month~~ year

5. Flow measurement equipment adequate to handle expected ranges of flow rates.

Yes X No _____ N/A _____

6. Calibration frequency adequate.

Yes X No _____ N/A _____

Laboratory Procedures

1. EPA-approved analytical testing procedures used and on-hand. (written)

Yes X No _____ N/A _____

2. If alternate analytical procedures used, proper approval obtained.

Yes X No _____ N/A _____

3. Calibration and maintenance of instruments and equipment satisfactory.

Yes X No _____ N/A _____

4. Written laboratory QA manual available.

Yes X No _____ N/A _____

5. QA procedures used.

Yes X No _____ N/A _____

6. QC procedures adequate.

Yes X No _____ N/A _____

7. Duplicate samples analyzed when having problems.

8. Spiked samples used every 6 mo. of time.

9. Commercial laboratory used.

Yes X No _____ N/A _____

Name Bonner Analytical Testing Company (Phenols only)

Address 2703 Oak Grove Rd., Hattiesburg, MS 39402

Contact Michael S. Bonner, Ph.D.

Phone 264-2854

Certification # _____

Laboratory Facilities and Equipment

1. Proper grade laboratory pure water available for specific analysis.

Yes X No _____ N/A _____

2. Dry, uncontaminated compressed air available.

Yes X No _____ N/A _____

3. Fume hood sufficiently ventilated.

Yes X No _____ N/A _____

4. Laboratory sufficiently lighted.

Yes X No _____ N/A _____

5. Adequate electrical sources available.

Yes X No _____ N/A _____

6. Instruments/equipment in good condition.

Yes X No _____ N/A _____

7. Written requirements for daily operation of instruments available.

Yes X No _____ N/A _____

8. Standards and appropriate blanks available to perform daily check procedures.

Yes X No _____ N/A _____

9. Written troubleshooting procedures for instruments available.
Yes ☒ No ☐ N/A ☐
10. Schedule for required maintenance exists.
Yes ☒ No ☐ N/A ☐
11. Proper volumetric glassware used.
Yes ☒ No ☐ N/A ☐
12. Glassware properly cleaned.
Yes ☒ No ☐ N/A ☐
13. Standard reagents and solvents properly stored.
Yes ☒ No ☐ N/A ☐
14. Working standard frequently checked.
Yes ☒ No ☐ N/A ☐
15. Standards discarded after recommended shelf-life has expired.
Yes ☒ No ☐ N/A ☐
16. Background reagents and solvents run with every series of samples.
Yes ☒ No ☐ N/A ☐
17. Written procedures exist for cleanup, hazard response methods, and applications of correction methods for reagents and solvents.
Yes ☒ No ☐ N/A ☐
18. Gas cylinders replaced at 100-200 psi. 500 psi
Yes ☐ No ☒ N/A ☐

Laboratory's Precision, Accuracy, and Control Procedures

1. Multiple replicates (blanks, duplicates, spikes, and splits) analyzed for each type of control check and information recorded.
Yes ☒ No ☐ N/A ☐
2. Plotted precision and accuracy control methods used to determine whether valid, questionable, or invalid data are being generated from day to day.
Yes ☒ No ☐ N/A ☐
3. Control samples introduced into the train of actual samples to ensure that valid data are being generated.
Yes ☒ No ☐ N/A ☐
4. Precision and accuracy of the analyses are sufficient.
Yes ☒ No ☐ N/A ☐

Data Handling and Reporting

1. Round-off rules uniformly applied.
Yes ☒ No ☐ N/A ☐
2. Significant figures established for each analysis.
Yes ☒ No ☐ N/A ☐

3. Provision for cross-checking calculation used.
Yes X No N/A
4. Correct formulas used to calculate final results.
Yes X No N/A
5. Control chart approach and statistical calculations for QC and report available and followed.
Yes X No N/A
6. Report forms developed to provide complete data documentation and permanent records to facilitate data processing.
Yes X No N/A
7. Data reported in proper form and units.
Yes X No N/A
8. Laboratory records readily available to regulatory agency for required time of 3 years.
Yes X No N/A
9. Laboratory notebook or pre-printed data forms bound permanently to provide good documentation.
Yes X No N/A
10. Efficient filing system exists, enabling prompt channeling of report copies.
Yes X No N/A

Laboratory Personnel

1. Enough analysts present to perform the analyses necessary.
Yes X No N/A
2. Analysts have on hand the necessary references for EPA procedures being used.
Yes X No N/A
3. Analysts trained in procedures performed through formal or informal training or certification programs.
Yes X No N/A

Comments: _____

HAITIENSBURG
39403-1937
FROM: 981201 TO: 981231
MONITORING PERIOD
NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	QUANTITY OR LOADING (13 Card Only) (46-59)			QUANTITY OR CONCENTRATION (14 Card Only) (39-45)			UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-69)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				
5-DAY (22-23) (C)	SAMPLE MEASUREMENT	486	1132	(26)	*****	*****	*****		0	As noted.	
PERMIT REQUIREMENT		244	232	LBS/DY	*****	*****	*****				
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	145	290	(26)	*****	*****	*****				
PERMIT REQUIREMENT		61	157	LBS/DY	*****	*****	*****		0	As noted.	
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	18	41	(26)	*****	*****	*****				
PERMIT REQUIREMENT		63	99	LBS/DY	*****	*****	*****		0	As noted.	
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	0.6	2.0	(26)	*****	*****	*****				
PERMIT REQUIREMENT		0.3	0.6	LBS/DY	*****	*****	*****		0	As noted.	
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	0.64	1.30	(26)	*****	*****	*****				
PERMIT REQUIREMENT		0.4	0.8	LBS/DY	*****	*****	*****		0	As noted.	
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT				*****	*****	*****				
PERMIT REQUIREMENT					*****	*****	*****				
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1318. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)										
Walter D. Langhans, PIt. Mgr.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT										
TYPED OR PRINTED	601584-3220										
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)	As noted.										
TELEPHONE	99 01 12										
DATE											

Form Approved.
OMB No. 2040-0004
Approval expires 05-31-98
1-INITIAL

NO DISCHARGE

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)				OFFICER OR AUTHORIZED AGENT	
CODE	NUMBER	YEAR	MO	DAY	

NOTE: Read instructions before completing this form.

PAGE 1 OF 1

Form Approved.
OMB No. 2040-0004
PROCESS MASTER
(SUCH SO)
INITIAL
Approved Expires 05-31-98

NOTE: Read instructions before completing this form.

TELEPHONE	DATE
601 584-3220	98 10 19

Form Approved.
OMB No. 2040-0044

*** NO DISCHARGE - 1 - 1 ***

[illegible]

Flowrate adjustments were made on 9/5,6,9, 13 due to equipment malfunction

W30001830
PERMIT NUMBER

001 A
DISCHARGE NUMBER

PROCESS MASTERMINT
(SUBS 511)
I - INITIAL
PAJDK
Form Approved.
EPA Form 3320-1 (08-95) Previous editions may be used.

FACILITY HERCULES INCORPORATED
LOCATION HATTIESBURG
ATTN: CARLES JORDAN

MONITORING PERIOD
YEAR MO DAY
93 03 01 TO 93 03 31

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	SAMPLE MEASUREMENT PERMIT REQUIREMENT	QUANTITY OR LOADING (13 Card Only) (46-53)		UNITS	QUANTITY OR CONCENTRATION (14 Card Only) (38-45)				UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM		MINIMUM	AVERAGE	MAXIMUM					
5-DAY (20 DES. C) EFFLUENT GROSS VALUE	299	726	232	PS/DY	*****	*****	*****	*****	*****	0	As noted.	
1-DAY (20 DES. C) EFFLUENT GROSS VALUE	448	1651	1527	PS/DY	*****	*****	*****	*****	*****	1	As noted.	
6 GREASE (FRESH EXTRA-IN METAL) TOTAL EFFLUENT GROSS VALUE	22	44	390	PS/DY	*****	*****	*****	*****	*****	0	As noted.	
PHENOL SINGLE COMPOND EFFLUENT GROSS VALUE	0.1	0.4	500	PS/DY	*****	*****	*****	*****	*****	0	As noted.	
34594 1 0 0 EFFLUENT GROSS VALUE	0.51	0.64	500	PS/DY	*****	*****	*****	*****	*****	0	As noted.	
THRU TREATMENT PLANT EFFLUENT GROSS VALUE	0.51	0.64	500	PS/DY	*****	*****	*****	*****	*****	0	As noted.	
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)											
Walter D. Langhans, Plt. Mgr.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT											
TELEPHONE	DATE											
601 584-3220	98 09 15											
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)												

Approved expires 05-31-98

I - INITIAL
MAJOR

*** NO MISLAKRE !!! ***

NOTE: Read instructions before completing this form.

(64-61)	MAXIMUM	UNITS	EX	ANALYSIS	TYPE
			(62-63)	(64-68)	(69-70)

95	(15)	0	As noted.
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105	DAILY 6X	DEG.F
2	DAYS	WEEK



8.0	(12)	0	As noted.
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900	MAXI™ LTM	50	0.0411 LBXAB	0005
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0 *	As noted.
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TELEPHONE	DATE
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601 584-3220	98	08	18
AREA			

TH	DATE	TIME	REPORTING AGENT	AREA CODE	NUMBER	YEAR	MO	DAY
1	11/11/2011	11:11	1111	1111	1111	11	11	11

0103/930115-1137 PAGE 10F

Form Approved.
OMB No. 2040-0004
Approved expires 05-31-98

Approved For Release 00-03-08
I - INITIAL
MAJOR

[illegible]

NOTE: Read instructions before completing this form.

MAXIMUM	UNITS	NO. OF EX ANALYSIS	SAMPLE TYPE
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0	As noted	(62-63)	(64-68)	(69-70)
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601-584-3220	98	10	19
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AL EXECUTIVE SPECIALIZED AGENT	AREA	NUMBER	YEAR	MO	DAY
	CODE				

095/980115-1137 PAGE 1 OF

OMB No. 2040-0004

Approval expires 05-31-98

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NOTE: Read instructions before completing this form.

CONCENTRATION	NO.	FREQUENCY
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OF	EX	ANALYSIS
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MAXIMUM	UNITS	(62-63)	(64-68)

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TELEPHONE

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AREA	NUMBER	YEAS
601	584-3220	98

THORIZED AGENT	CODE	NUMBER	YEAR
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0117/980115-1137 PAGE

Figure 1

Form Approved.

Approval expires 05-31-98

1

NOTE: Read instructions before completing this form.

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments, local laws, and Departmental improvement or otherwise to monitor and a year.)	OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

Flowrate adjustments were made on 7/2,3,6,7,8,9,10 due to equipment malfunctions

PROCESS MAINTENANCE (SUGAR SO) I - INITIAL

*** NO DISC

... completing it

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

NAME: HERCULES INCORPORATED
ADDRESS: P O BOX 14937
6103 WEST 7TH STREET
DALLAS, TEXAS 75220
FACILITY: HERCULES INCORPORATED
LOCATION: DALLAS, TEXAS
ATTN: CHARLES JORDAN

PERMIT NUMBER: 50001830
DISCHARGE NUMBER: 011A

MONITORING PERIOD
FROM: YEAR 95 MO 05 DAY 25 TO YEAR 95 MO 31 DAY 31

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	QUANTITY OR LOADING (3 Card Only) (14-53)			QUANTITY OR CONCENTRATION (4 Card Only) (38-45)			UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-69)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				
5-DAY (20-25) (1)	SAMPLE MEASUREMENT	454	961	(25)	*****	*****	*****		0	As noted	
CO310 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	1244	2322	LB/DY	*****	*****	*****				
ADDS TOTAL EXPENDED	SAMPLE MEASUREMENT	140	221	(25)	*****	*****	*****		0	As noted	
00560 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	251	1557	LB/DY	*****	*****	*****				
OIL & GREASE (FRED EXTR-1K MET) TOT, PC	SAMPLE MEASUREMENT	26	56	(25)	*****	*****	*****		0	As noted	
00560 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	660	990	LB/DY	*****	*****	*****				
PHENOL, SINGLE COMPOUND	SAMPLE MEASUREMENT	0.9	2.1	(26)	*****	*****	*****		0	As noted	
34594 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	603	603	LB/DY	*****	*****	*****				
FLUORIDE CONDUCTOR TARD TREATMENT PLANT	SAMPLE MEASUREMENT	0.69	1.06	(33)	*****	*****	*****		0	As noted	
50500 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	603	603	LB/DY	*****	*****	*****				
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	SAMPLE MEASUREMENT										
Walter D. Langhans, Plt. Mgr.	PERMIT REQUIREMENT										
TYPED OR PRINTED	PERMIT REQUIREMENT										
COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)											
I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I ADVISE THAT THERE ARE NO SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. 1001 AND 33 U.S.C. 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)											
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT										6/15/98	
TELEPHONE										501 584-3220	
DATE										98 06 18	

Approval expires 05-31-98

LIBRARY

*** NO DISCHARGE ***

DAY

NOTE: Read instructions before completing this form.

[illegible]

EX UP ANALYSIS (62-68) (64-68) (65-70)	AVERAGE		MAXIMUM		UNITS	
	AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM

SAMPLE MEASUREMENT	*****	*****	*****	(15)
0300 FAKENHET	*****	*****	*****	03

[illegible]

SAMPLE	DATE	TIME	LOCATION	WEEK
1	1/1/1980	10:00	1000	1
2	1/2/1980	10:00	1000	2
3	1/3/1980	10:00	1000	3
4	1/4/1980	10:00	1000	4
5	1/5/1980	10:00	1000	5
6	1/6/1980	10:00	1000	6
7	1/7/1980	10:00	1000	7
8	1/8/1980	10:00	1000	8
9	1/9/1980	10:00	1000	9
10	1/10/1980	10:00	1000	10
11	1/11/1980	10:00	1000	11
12	1/12/1980	10:00	1000	12
13	1/13/1980	10:00	1000	13
14	1/14/1980	10:00	1000	14
15	1/15/1980	10:00	1000	15
16	1/16/1980	10:00	1000	16
17	1/17/1980	10:00	1000	17
18	1/18/1980	10:00	1000	18
19	1/19/1980	10:00	1000	19
20	1/20/1980	10:00	1000	20
21	1/21/1980	10:00	1000	21
22	1/22/1980	10:00	1000	22
23	1/23/1980	10:00	1000	23
24	1/24/1980	10:00	1000	24
25	1/25/1980	10:00	1000	25
26	1/26/1980	10:00	1000	26
27	1/27/1980	10:00	1000	27
28	1/28/1980	10:00	1000	28
29	1/29/1980	10:00	1000	29
30	1/30/1980	10:00	1000	30
31	1/31/1980	10:00	1000	31

MEASUREMENT			
DESIGNATION			
	7.5	+++++	0
	8.1		As noted

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ELONG IN CONDUIT OR TREATMENT OF MEASUREMENT	SAMPLE						
0 79	(03)	*****	*****	*****	*****	*****	*****
1 77		*****	*****	*****	*****	*****	*****

PERMIT	REPORT	PERMIT	REPORT
0	As noted.	0	As noted.

[illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible][illegible]

MEASUREMENT				

PERMIT REQUIREMENT					

[illegible]

1-16

DATE	1-16
TELEPHONE	

Walter D. Langhans, P.t. Mgr
 I AM AWARE THAT THERE ARE
 SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING
 THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33
 U.S.C. § 1331. *(Penalties under the law.)*
 6/15/58
 SIGNATURE OF PERSONAL REPRESENTATIVE
 6011 584-3220 98
 06
 18

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (reference all attachments here)	TYPED OR PRINTED	DATE	MO	DAY	OFFICER OR AUTHORIZED AGENT	QUESTIONS OF PRINCIPAL EXECUTIVE	
						AREA CODE	NUMBER
Subject's violation: If someone without proper authority may receive fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)		05-22-20	00	10			

Flowrate adjustments were made on 5/2,3,4,5,6,7, and 29 due to equipment malfunction

Approved expires 05-31-98

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NO	FREQUENCY	CASES
are completing this form.		

NO.	OF EX ANALYSIS	SAMPLE TYPE
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(62-63)	(64-68)	(69-70)
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ARTICLE 1

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3220	98	07	20
YEAR	MO	DAY	

YEAR	MO	DAY
1994	01	01

PAGE 107

PAGE 1 OF 1

Form Approved.
OMB No. 2040-0041
Approved Expires 05-31-98

MAJOR

DISCIPLINE

NOTE: Read instructions before completing the form

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

Form Approved. DMB No. 2040-0004
Approval expires 05-31-98

*** NO DISCHARGE ***

NOTE: Read instructions before completing this form.

*** NO DISCHARGE ***

NOTE: Read instructions before completing this form.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME HERCULES INCORPORATED
ADDRESS P O BOX 1937
613 WEST 7TH STREET
HATTIESBURG
FACILITY HERCULES INCORPORATED
LOCATION HATTIESBURG
ATTN: CHARLES JORDAN

MS 39403-1937

FROM

YEAR MONTH DAY
90 01 01

TO YEAR MONTH DAY
98 01 01

MS0001830
PERMIT NUMBER

002 A
DISCHARGE NUMBER

STORM WATER, NUNC ONCE
(SUBR SO)
I - INITIAL
MAJOR

Form Approved
Approval 8/28/95 05-31-98

*** NO DISCHARGE 1-1 ***

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	SAMPLE MEASUREMENT	QUANTITY OR LOADING (13 Cont Only) (44-53)			QUANTITY OR CONCENTRATION (14 Cont Only) (38-45)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
TEMPERATURE, WATER DEG. FAHRENHEIT 0011 1 0 0	PERMIT REQUIREMENT	*****	*****	****	*****	*****	105	0	As noted.	DEG.F (12)
EFFLUENT GROSS VALUE 00400 1 0 0	SAMPLE MEASUREMENT	*****	*****	****	7.0	*****	8.3	0	As noted.	CONCENTRATION SU
EFFLUENT GROSS VALUE 50050 1 0 0	PERMIT REQUIREMENT	*****	*****	****	*****	*****	*****	0	As noted.	CONCENTRATION SU
THRU TREATMENT PLANT EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	1.42	4.64	(03)	*****	*****	*****	0	As noted.	CONCENTRATION SU
	PERMIT REQUIREMENT	*****	*****	****	*****	*****	*****	0	As noted.	CONCENTRATION SU
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
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	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									
	SAMPLE MEASUREMENT									
	PERMIT REQUIREMENT									

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 23 U.S.C. § 1318. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

DATE

Walter D. Langhans, PIt. Mgr

TYPED OR PRINTED

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

601-584-3220

98 02 02

Flowrate adjustment was made on 1/20/98 due to equipment malfunction.

FACILITY NAME: HATTIESBURG INCORPORATED
LOCATION: HATTIESBURG, MS
ATTN: CHARLES JORDAN

PERMIT NUMBER: MS0001330
DISCHARGE NUMBER: 001
MONITORING PERIOD:
FROM: 03/01/98 TO: 03/31/98

PROCESS: WASTEWATER
I - INITIAL
MAJOR

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	QUANTITY OR LOADING (13 Card Only) (46-53)			QUANTITY OR CONCENTRATION (14 Card Only) (38-45)			UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-69)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				
CARBON TOTAL ORGANIC (TOC)	SAMPLE MEASUREMENT	405	728	1.26	***	***	***	0	As noted.		
COBALT	PERMIT REQUIREMENT				***	***	***				
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT				***	***	***				
	PERMIT REQUIREMENT				***	***	***				
	SAMPLE MEASUREMENT				***	***	***				
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	PERMIT REQUIREMENT				***	***	***				
	SAMPLE MEASUREMENT				***	***	***				
	PERMIT REQUIREMENT				***	***	***				

NAME/TITLE: PRINCIPAL EXECUTIVE OFFICER
Walter D. Langhans, P.Lt. Mgr.
TYPED OR PRINTED

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: 601-584-3220
DATE: 98 04 16

FACILITY NAME/ADDRESS
HATFIELD INCORPORATED
515 WEST 7TH STREET
ATLANTA, GEORGIA 30303-1937MONITORING PERIOD
FROM YEAR MO DAY TO YEAR MO DAY
1998 01 01 1998 03 31I - INITIAL
MAJOR

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	QUANTITY OR LOADING (13 Card Only) (46-59)			QUANTITY OR CONCENTRATION (14 Card Only) (38-45)			UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				
1050 STAT 498K ACU C ERIDODAPHNIA TA338 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	*****	*****		13.4	*****	*****	(23)	0	As noted.	
1050 STAT 208K ACU P PHALES TA338 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	10.7 40 MIN	*****	*****	PER- CENT	0	As noted.	
	SAMPLE MEASUREMENT										
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032/980115-1137 PAGE 1 OF 1

Form Approved.
OMB No. 2040-0004
Approval expires 05-31-98

*** NO DISCHARGE ☐ ***

NOTE: Read instructions before completing this form

*** NO DISCHARGE ☐ ***

NOTE: Read instructions before completing this form

[illegible]

Flowrate adjustment was made on 1/20/98 due to equipment malfunction.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
NAME HERCULES INCORPORATED
ADDRESS P O BOX 1937
613 WEST 7TH STREET
HATTIESBURG
HATTIESBURG
HERCULES INCORPORATED
LOCATION HATTIESBURG
ATTN: CHARLES JORDAN

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(12-16)
MS00001930
PERMIT NUMBER
001 A
DISCHARGE NUMBER

Form Approved.
OMB No. 2040-0004
Approved 12/9/95-05-31-98
PROCESS WASTEWATER
(SUBR 501)
I - INITIAL
MAJOR

MS 39403-1937
MS
FROM 97 12 01
TO 97 12 31

MONITORING PERIOD
YEAR MO DAY
97 12 01
YEAR MO DAY
97 12 31

*** NO DISCHARGE 1-1 ***
NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	(3 Card Only) (46-53)		(54-61)		(4 Card Only) (38-45)		(46-53)		(54-61)		NO. EX (62-69)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS						
BOD, 5-DAY (20 DEG. C)	SAMPLE MEASUREMENT	725	1660	(26)	*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	1244	2322	DAILY	*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	416	1045	(26)	*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	561	1557	DAILY	*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
OIL & GREASE (FREDON EXTR.-IR METHOD)	SAMPLE MEASUREMENT	53	96	(26)	*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	560	990	DAILY	*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
PHENOL, SINGLE COMPOUND	SAMPLE MEASUREMENT	1.5	2.8	(26)	*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	3.3	5.6	DAILY	*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
FLOW, IN CONDUIT OR THRU TREATMENT PLANT	SAMPLE MEASUREMENT	1.19	1.91	(03)	*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	1.19	1.91	DAILY	*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT				*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT				*****	*****	*****	*****	*****	0	As noted	3	DAYS	COMP 24
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER														
Walter D. Langhans, PIt. Mgr.														
TYPED OR PRINTED														

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1318. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 6 years.)
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
1/19/98
601584-3220
98 01 19

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)
NAME HERCULES INCORPORATED
ADDRESS P O BOX 1937
613 WEST 7TH STREET
HAITIENSBURG
HAITIENSBURG INCORPORATED
LOCATION HAITIENSBURG MS
ATTN: CHARLES JORDAN
MS 39403-1937
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
MS0001830
PERMIT NUMBER
002 A
DISCHARGE NUMBER
STORM WATER, NONC
(SUBR SD)
I - INITIAL
MAJOR
NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	QUANTITY OR LOADING (13 Card Only) (46-53)			QUANTITY OR CONCENTRATION (14 Card Only) (38-45)			NO. EX ANALYSIS (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM			
TEMPERATURE OF WATER DEG. FAHRENHEIT 00011 1 0 0	SAMPLE MEASUREMENT	*****	*****	*****	*****	*****	77	0	As noted	
EFFLUENT GROSS VALUE 00400 1 0 0	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	105	0	As noted	
FLOW IN CONDUIT OR THRU TREATMENT PLANT 50050 1 0 0	SAMPLE MEASUREMENT	1.06	2.20	(03)	*****	*****	*****	0	As noted	
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	*****	*****	*****	*****	*****	*****	0	As noted	
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PROCESS HASTENATER
 (SUBR 50)
 I - INITIAL
 12345
 OMB NO. 20-50-0004
 Approval expires 05-31-98

***** NO DISCHARGE *****
NOTE: Read instructions before completing this form

CONCENTRATION NO. EFFICIENCY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

BIDASSAY REQUIREMENT
 EXPIRATION DATE: expires 05-31-98
 CRYE NO. 2040-0004

(SUBR 50) 12345

1 - INITIAL
MAR 1968

MAJUK

*** NO DISCHARGE ***
NOTE: Read instructions before completing this form.

CONCENTRATION	NO.	FREQUENCY	SAMPLE
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MAJUK

NOTE: Read instructions before completing this form.

CONCENTRATION	NO.	FREQUENCY	SAMPLE
---------------	-----	-----------	--------

OF ANALYSIS TYPE	EX	(54-61)
------------------------	----	---------

MAXIMUM UNITS	PARTIAL UNITS
(62-63)	(64-68)
(69-70)	

***	***** (23)	0	As noted

*****	PER-	DIRLY	COMP2
	CENT		

##	#####	(23)	0	As noted
##				

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TELEPHONE	DATE

PRINCIPAL EXECUTIVE OFFICER AUTHORIZED AGENT	AREA	NUMBER	YEAR	MO	DAY
11/17/18	601	584-3220	98	01	19

UNITED STATES	CODE	NUMBER	DATE	TIME
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PAGE 1 OF 1

NAME HERCULES INCORPORATED

ADDRESS P O BOX 1937

613 WEST 7TH STREET

HAITIERSBURG

FACILITY HERCULES INCORPORATED

LOCATION HAITIERSBURG

ATTN: CHARLES JORDAN

MS 39403-1937

MS 39403-1937

PERMIT NUMBER

DISCHARGE NUMBER

MONITORING PERIOD

FROM

TO

NOTE: Read Instructions before completing this form.

MS 39403-1937

YEAR 97 MO 11 DAY 01

YEAR 97 MO 11 DAY 30

PROCESS WASTEWATER (SUBR 501) I - INITIAL MAJOR

PARAMETER (32-37)

QUANTITY OR LOADING (14-61)

QUANTITY OR CONCENTRATION (14-61)

NO. OF ANALYSIS (64-68) SAMPLE TYPE (69-70)

PARAMETER (32-37)	QUANTITY OR LOADING (14-61)	QUANTITY OR CONCENTRATION (14-61)	NO. OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
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BOD, 5-DAY (20 DEG. C)	945	1407	0	As noted
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EFFLUENT GROSS VALUE	1244	2322	3	DAYS COMP 24
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EFFLUENT GROSS VALUE	509	1024	0	As noted
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EFFLUENT GROSS VALUE	561	1557	3	DAYS COMP 24
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EFFLUENT GROSS VALUE	82	201	0	As noted
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EFFLUENT GROSS VALUE	660	990	3	DAYS COMP 24
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EFFLUENT GROSS VALUE	0.6	1.3	0	As noted
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EFFLUENT GROSS VALUE	3.3	6.6	3	DAYS COMP 24
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EFFLUENT GROSS VALUE	1.18	1.66	0	As noted
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EFFLUENT GROSS VALUE	NO AVG	REPORT DAILY MX	CONTINUED	
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EFFLUENT GROSS VALUE	MEASUREMENT	MEASUREMENT		
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EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	PERMIT REQUIREMENT		
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EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	SAMPLE MEASUREMENT		
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EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	PERMIT REQUIREMENT		
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EFFLUENT GROSS VALUE	NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		
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EFFLUENT GROSS VALUE	Walter D. Langhans, Plt. Mgr.	Walter D. Langhans, Plt. Mgr.		
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EFFLUENT GROSS VALUE	TYPED OR PRINTED	TYPED OR PRINTED		
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EFFLUENT GROSS VALUE	COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)	COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)		
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PERMITTEE NAME/ADDRESS (Include Facility Name/Location if Different)

NAME HERCULES INCORPORATED
ADDRESS P O BOX 1937
613 WEST 7TH STREET
HAITIERSBURG

FACILITY HERCULES INCORPORATED
LOCATION HAITIERSBURG

ATTN: CHARLES JORDAN

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(12-16)

MS0001R30
PERMIT NUMBER

001 A
DISCHARGE NUMBER

Form Approved.
EPA Form No. 2040-0004
Approval Expires 05-31-98
PROCESS WASTEWATER
(SUBR SD)
I - INITIAL
MAJOR

MS 39403-1937

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
97	10	01	97	10	31

*** NO DISCHARGE ***
NOTE: Read Instructions before completing this form.

PARAMETER (32-37)		QUANTITY OR LOADING (13 Card Only) (46-53)			QUANTITY OR CONCENTRATION (14 Card Only) (38-45)			QUANTITY OR CONCENTRATION (15 Card Only) (46-53)			NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM	UNITS					
BOD ₅ -5-DAY (20 DEG. C)	SAMPLE MEASUREMENT	1012	1593	(26)	*****	*****	*****		0	(As noted)			
00310 1 0 0	PERMIT REQUIREMENT	1244	2322	DAILY MX	*****	*****	*****		3	DAYS/COMP 24			
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT		528	(26)	*****	*****	*****		0	(As noted)			
PHENOL, TOTAL	PERMIT REQUIREMENT	561	1557	DAILY MX	*****	*****	*****		3	DAYS/COMP 24			
00530 1 0 0	SAMPLE MEASUREMENT	63	138	(26)	*****	*****	*****		0	(As noted)			
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	660	990	DAILY MX	*****	*****	*****		3	DAYS/COMP 24			
OIL & GREASE (FREDN EXTRACT-IR METH) TOT, RC	SAMPLE MEASUREMENT				*****	*****	*****		0	(As noted)			
00560 1 0 0	PERMIT REQUIREMENT	2.3	3.6	(26)	*****	*****	*****		3	DAYS/COMP 24			
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	1.10	1.39	(03)	*****	*****	*****		0	(As noted)			
PHENOL, SINGLE COMPOUND	PERMIT REQUIREMENT	3.3	6.6	DAILY MX	*****	*****	*****		3	DAYS/COMP 24			
34694 1 0 0	SAMPLE MEASUREMENT				*****	*****	*****		0	(As noted)			
EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	1.10	1.39	(03)	*****	*****	*****		0	(As noted)			
FLOW, IN CONDUIT OR THRU TREATMENT PLANT	SAMPLE MEASUREMENT				*****	*****	*****		0	(As noted)			
50050 1 0 0	PERMIT REQUIREMENT				*****	*****	*****		0	(As noted)			
EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT				*****	*****	*****		0	(As noted)			
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STORM WATER, NON-POINT SOURCE BEST MANAGEMENT PRACTICES

12345
(SUBR 50)

I - INITIAL

MAJOR

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NOTE: Read instructions before completing this form.

NOTE: Read instructions before completing this form.

CONCENTRATION	NO. OF SAMPLES	EXPERIMENTAL TYPE
(54-611)		

MAXIMUM UNITS	EX ANALYSIS	TYPE
652.591	154.681	159.701

10/25/09	10/25/09	10/25/09	10/25/09
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DAVID M.	DECEMBER	1950
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601	584-3220	97	11	12
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AREA CODE	NUMBER	YEAR	MO	D
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2002

2018

PAGE 1 OF 1

10/10/2010 10:10:10

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME HERCULES INCORPORATED

ADDRESS BOX 1937

613 WEST 7TH STREET

HAITI-ESBOURG MS 39401-1937

FACILITY HERCULES INCORPORATED

LOCATION

ATTN: CHARLES JORDAN

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGE MONITORING REPORT (DMR) (2-16)

DISCHARGE MONITORING REPORT (DMR)

PERMIT NUMBER 000001830

DISCHARGE NUMBER 001 M

PERMIT NUMBER 001 M

DISCHARGE NUMBER 001 M

PERMIT NUMBER 001 M

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PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)
NAME HERRICKS INCORPORATED
ADDRESS BOX 1937
613 WEST 7TH STREET
HAITESBURG MS 39401-1937
LOCATION
ATTN: CHARLES JORDAN

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
(12-16)
MS00C1830
PERMIT NUMBER
001 N
DISCHARGE NUMBER
PROCESS IN & Filler Approved
(SUBS SO)
F - FINAL
OMB No. 2040-0004
MAJOR

MONITORING PERIOD					
YEAR	MO	DAY	YEAR	MO	DAY
97	08	31	97	09	31

NOTE: NO DISCHARGE 1-1 ***
NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	QUANTITY OR LOADING		QUALITY OR CONCENTRATION		UNITS	NO. EX	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE (46-53)	MAXIMUM (34-61)	MINIMUM (38-45)	AVERAGE (46-53)				
0030 1 0 0 (20 DEC 97) EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT PERMIT REQUIREMENT	688	1220	*****	*****	0	0	As noted.	
0030 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT PERMIT REQUIREMENT	359	1492	*****	*****	0	0	As noted.	
0030 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT PERMIT REQUIREMENT	55	134	*****	*****	0	0	As noted.	
0030 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT PERMIT REQUIREMENT	581	966	*****	*****	0	0	As noted.	
0030 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT PERMIT REQUIREMENT	1.1	1.9	*****	*****	0	0	As noted.	
0030 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT PERMIT REQUIREMENT	1.10	1.40	*****	*****	0	0	As noted.	
0030 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT PERMIT REQUIREMENT			*****	*****	0	0	As noted.	
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 USC § 1001 AND 33 USC § 1319. Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 5 months and 3 years.								
Walter D. Langhans, Plant Mgr	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT								
TELEPHONE	DATE								
601 584-3220	97 09 08								

TOTAL FACILITY Form Approved

OMB No. 2040-0004

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NOTE: Read instructions before completing the test.

CONCENTRATION (54-61)	NO. OF EX ANALYSIS
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	MAXIMUM	UNITS
	(62-63)	(64-68)

95	0	As no
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TELEPHONE	
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PRINCIPAL EXECUTIVE	601 584-3220	97
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THORIZED AGENT	AREA CODE	NUMBER	YEAR
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PAGE 00145/970107-1444

OF
1

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)
NAME: HECULES INCORPORATED
ADDRESS: 13 WEST 7TH STREET
CITY: HAITESBURG MS 39401-1937

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)
PERMIT NUMBER: MS0001830
DISCHARGE NUMBER: 001 N

PROCESS: WM & FORM Approved
F - FINAL
OMB No. 2040-0065

LOCATION: CHARLES JORDAN

MONITORING PERIOD
FROM: 12/21/2021 TO: 12/23/2021
YEAR: 2021 MONTH: 12 DAY: 21

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	QUANTITY OR LOADING (3 Card Only) (46-53)			QUALITY OR CONCENTRATION (4 Card Only) (38-45)			UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE	MAXIMUM	UNITS	MINIMUM	AVERAGE	MAXIMUM				
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	447	1376	25	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	1334	3051	155/DY	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	111	350	26	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	300A BCD	300A BCD	155/DY	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	53	282	26	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	300A BCD	300A BCD	155/DY	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	303	822	26	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	300A BCD	300A BCD	155/DY	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	0.9	3.0	26	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	300A BCD	300A BCD	155/DY	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	0.89	2.15	26	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	300A BCD	300A BCD	155/DY	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	0.89	2.15	26	*****	*****	*****	0	0	As Noted	
300, 5-DAY (20 DEG. C) EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	300A BCD	300A BCD	155/DY	*****	*****	*****	0	0	As Noted	

PROCESSED WITH E FORM Approved
(SUGAR CO)
F - FINAL
OAKR
OMB No. 2040-0045
Forest Co.

*** NO DISCHARGE ***

NOTE: Read instructions before completing this form.

PARAMETER (32-37)	(38-39)		UNITS	(40-41)		UNITS	(42-43)		UNITS
	AVERAGE	MAXIMUM		MINIMUM	AVERAGE		MAXIMUM		
				*****			*****		
			26)	*****			*****		0
				*****			*****		As Noted

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE		DATE	
AREA	NUMBER	YEAR	MO	DAY	
601	5453450	97	04	14	
I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED ON MY INQUIRY WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THESE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, SEE 18 USC § 1001 AND THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 USC § 1001 AND 33 USC § 1319 (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)					
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT					

COMMENT AND EXPLANATION OF ANY VIOLATIONS

EPA Form 3320-1 (Rev. 8-85) Previous editions may be used.

(REPLACES EPA FORM T-40 WHICH MAY NOT BE USED)

00128/970107-1441

PAGE 1 OF

ATTN: CHARLES JORDAN

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(20-21)	(22-23)	(24-25)	(26-27)	(28-29)	(30-31)
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NOTE: Read instructions before completing this form

DATE

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME: HATFIELD INCORPORATED

ADDRESS: 613 WEST 7TH STREET

CITY: HATTIESBURG

STATE: MS 39401-1937

LOCATION: HATFIELD INCORPORATED

ATTN: CHARLES JORDAN

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGE MONITORING REPORT (DMR)

DISCHARGE MONITORING PERIOD (12/19)

PERMIT NUMBER: MS0001930

DISCHARGE NUMBER: 00215

DATE: 02/15/97

FROM: 01/01/97 TO: 02/15/97

MONITORING PERIOD

TOTAL FACILITY Form Approved

OMB No. 2040-0045

DATE: 02/15/97

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OMB No. 2040-0604

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TELEPHONE

01 | 545-3450 | 97

AREA CODE	NUMBER	YEAR
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PAGE	NO.
1444	

MONITORING PERIOD
FROM YEAR 92 MO 1 DAY 1 TO YEAR 92 MO 1 DAY 1
NOTE: Read instructions before completing this form.

PARAMETER (32-37)	X	QUANTITY OR LOADING		QUALITY OR CONCENTRATION		UNITS	NO. EX	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
		AVERAGE (46-53)	MAXIMUM (54-61)	MINIMUM (38-45)	AVERAGE (46-53)	MAXIMUM (54-61)			
00310 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	405	1060	***	***	***	0	As Noted	
00310 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	300A G/G	300A G/G	***	***	***	0	As Noted	
00530 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	569	1066	***	***	***	0	As Noted	
00530 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	400A G/G	400A G/G	***	***	***	0	As Noted	
00530 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	78	170	***	***	***	0	As Noted	
00530 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	300A G/G	300A G/G	***	***	***	0	As Noted	
00680 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	527	1302	***	***	***	0	As Noted	
00680 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	300A G/G	300A G/G	***	***	***	0	As Noted	
00680 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	0.6	1.6	***	***	***	0	As Noted	
00680 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	300A G/G	300A G/G	***	***	***	0	As Noted	
00680 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	0.72	1.30	***	***	***	0	As Noted	
00680 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	300A G/G	300A G/G	***	***	***	0	As Noted	

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
G. D. Burch, Plant Manager
I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY WITH THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 USC § 1001 AND 33 USC § 1319. (Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.)
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT
601 545-3450
AREA CODE NUMBER
97 03 19
DATE

LOCATION HATIESBURG MS 39401-1937
ATTN: CHARLES JORDAN
FROM YEAR 2021 MO 01 DAY 19 TO YEAR 2021 MO 01 DAY 19
MONITORING PERIOD (12-21) (12-23) (24-25) (26-27) (28-29) (30-31)
NOTE: Read instructions before completing this form.

PARAMETER (32-37)	SAMPLE MEASUREMENT	(3 Card Only) (46-53)		UNITS	(4 Card Only) (48-45)			(46-53)			(54-61)			UNITS	NO. EX. ANALYSIS (62-63)	FREQUENCY OF ANALYSIS (64-68)	TYPE (69-70)
		AVERAGE	MAXIMUM		MINIMUM	AVERAGE	MAXIMUM	MINIMUM	AVERAGE	MAXIMUM							
0030 1 0 0 (20 DEC. C) EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	1634	3091	26	*****	*****	*****	*****	*****	*****	*****	*****	*****	0	As Noted	WEEK	As Noted
0050 1 0 0 PENDING EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	491	1752	26	*****	*****	*****	*****	*****	*****	*****	*****	*****	1A	As Noted	WEEK	As Noted
0050 1 0 0 OIL & GREASE (FROM EXTRACT-IN NET) TOTAL EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	279	1648	26	*****	*****	*****	*****	*****	*****	*****	*****	*****	0	As Noted	WEEK	As Noted
0060 1 0 0 CARBON, TOT ORGANIC (TOC) EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	1228	2192	26	*****	*****	*****	*****	*****	*****	*****	*****	*****	0	As Noted	WEEK	As Noted
0060 1 0 0 PHENOLS EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	2300	3800	26	*****	*****	*****	*****	*****	*****	*****	*****	*****	1A	As Noted	WEEK	As Noted
0060 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	3.1	8.4	26	*****	*****	*****	*****	*****	*****	*****	*****	*****	0*	As Noted	WEEK	As Noted
0070 1 0 0 IN CONDUIT OR TREATMENT PLANT EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	0.92	1.34	26	*****	*****	*****	*****	*****	*****	*****	*****	*****	0*	As Noted	WEEK	As Noted
0070 1 0 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT				*****	*****	*****	*****	*****	*****	*****	*****	*****				
0070 1 0 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT				*****	*****	*****	*****	*****	*****	*****	*****	*****				
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 USC § 1001 AND 33 USC § 1319. Penalties under these statutes may include fines up to \$10,000 and/or maximum imprisonment of between 6 months and 5 years.															
G. D. Burch, Plant Mgr.		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT															
TELEPHONE		DATE															
601 545-3450		97 02 14															

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

*Flowrate adjustments were made on 1/7,10,11,12,13,14,15,16 due to equipment malfunction.
A = Excursion caused by mechanical cleaning of 5 million gallon equalization tank.

NAME: HAWKES INCORPORATED

PERMIT NUMBER: MS0001830

DISCHARGE NUMBER: 002 N

TOTAL FACILITY Form Approved

DATE: 02/19/97

ADDRESS: 613 WEST 7TH STREET

PERMIT NUMBER: MS0001830

DISCHARGE NUMBER: 002 N

TOTAL FACILITY Form Approved

DATE: 02/19/97

CITY: HATTIESBURG

PERMIT NUMBER: MS0001830

DISCHARGE NUMBER: 002 N

TOTAL FACILITY Form Approved

DATE: 02/19/97

FACILITY: HAWKES INCORPORATED

PERMIT NUMBER: MS0001830

DISCHARGE NUMBER: 002 N

TOTAL FACILITY Form Approved

DATE: 02/19/97

LOCATION: HATTIESBURG

PERMIT NUMBER: MS0001830

DISCHARGE NUMBER: 002 N

TOTAL FACILITY Form Approved

DATE: 02/19/97

ATTN: CHARLES JORDAN

PERMIT NUMBER: MS0001830

DISCHARGE NUMBER: 002 N

TOTAL FACILITY Form Approved

DATE: 02/19/97

DATE: 02/19/97

PERMIT NUMBER: MS0001830

DISCHARGE NUMBER: 002 N

TOTAL FACILITY Form Approved

DATE: 02/19/97

PARAMETER (32-37)

(3 Card Only)

QUANTITY OR LOADING

(4 Card Only)

QUALITY OR CONCENTRATION

(5 Card Only)

NO. OF ANALYSIS

SAMPLE TYPE

TEMPERATURE WATER

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AVERAGE

MAXIMUM

MINIMUM



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

August 24, 1998

*File
NPDES
Permit*

Certified Mail - Return Receipt Requested
Cert. # P 443-543-656

Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, Ms. 39289-0385

RECEIVED
AUG 25 1998
Dept. of Environmental Quality
Office of Pollution Control

Dear Mr. Yassin:

The purpose to this letter is to follow up our previous voice mail. On Monday, 08/17/98, our effluent discharge of 1,651 lbs/day exceeded our NPDES permit limit (1,557 lbs/day) for TSS. Analysis before and after this sample were 598 lbs/day and 586 lbs/day, respectively.

Investigations have not indicated any direct cause of this excursion, other than the possibility of sample mixup. If I can answer any additional questions, please let me know.

Sincerely,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

cc: Walt Langhans
Plant Manager



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

August 18, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-655

RECEIVED
AUG 21 1998
Dept. of Environmental Quality
Office of Pollution Control

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the July, 1998.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in blue ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:

To: Earl Mahhafey
From: Mohammad Yassin
Date: December 17, 1998
Subject: Hercules' Acute Toxicity Test

On November 5, 1998, we received a letter for USEPA, Region IV, concerning Acute Toxicity Tests collected at Hercules in June of this year. In the letter it was mentioned that the sample taken at Hercules fail the test. We had received the referenced analysis about a month ago and I wrote an NOV letter to the facility. The following was indicated in the letter; the facility collected their own samples on June 27, 1998, and the sample passed the Acute Toxicity Test. I sent a copy of Hercules test to Doug Upton for him to look at and tell us whether the sample was collected and analyzed properly. The facility is required to test within two weeks of test failure (permit condition), and they have done this. Please let me know if you have any questions.



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
FAX: (601) 584-3226
<http://www.herc.com>

December 16, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-571

RECEIVED
DEC 23 1998
Dept. of Environmental Quality
Office of Pollution Control

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the November, 1998.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in blue ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

December 4, 1998

Charlie Jordan
613 West 7th Street
P. O. Box 1937
Hattiesburg, MS 39403-1937

Re: Hercules

MS0001830, Forrest County

Dear Mr. Jordan;

Enclosed is a copy of the Compliance Monitoring Inspection (CMI) Report and sampling that was performed at Hercules on October 27, 1998. The results of this inspection should be used as a guide for complying with requirements and limitation as stated in your NPDES permit. The results indicate that the effluent was in compliance with the permit.

If you have any questions please call me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
FAX: (601) 584-3226
<http://www.herc.com>

November 6, 1998

*File
NPDES
Forest*

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z-079-760-447

RECEIVED
NOV 12 1998
Dept. of Environmental Quality
Office of Pollution Control

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the October, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 29 1998

RECEIVED
NOV - 5 1998
Dept. of Environmental Quality
Office of Pollution Control

Mr. Don Watts, Chief
Environmental Compliance and Enforcement Division
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-5171

RE: Acute Toxicity Tests Conducted by EPA Region 4

Dear Mr. Watts:

USEPA Region 4 conducted acute toxicity tests on final effluent from the subjected facilities listed below. Acute toxicity tests were conducted on a composite samples of effluent collected by Mississippi Department of Environmental Quality personnel and shipped to the USEPA Athens, Georgia laboratory. Enclosed are toxicity test results for the following facilities:

- 1) Hercules, Inc. - MS0001830
- 2) Burlington Ind., Inc. - MS0001848
- 3) Dupont - MS0027294
- 4) Ash Corporation - MS0002020
- 5) Jackson County - MS0002674
- 6) Masonite Corp. - MS0003042

Please note that Hercules, Inc. and Burlington Ind., Inc. failed toxicity tests. If you have any questions call me at 404-562-9757.

Sincerely,

Parvez A. Mallick

Parvez A. Mallick
Environmental Engineer
Clean Water Act Enforcement Section

Enclosure



File
NPDES
Form 1 & 2

October 14, 1998

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
FAX: (601) 584-3226
<http://www.herc.com>

Certified Mail - Return Receipt Requested
Cert. # P 443-543-566

RECEIVED
OCT 20 1998
Dept. of Environmental Quality
Office of Pollution Control

Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, Ms. 39289-0385

Dear Mr. Yassin:

Please find our response to your October 7, 1998, letter addressing the acute toxicity test on our June 2, 1998, effluent.

Our NPDES compliance monitoring results, on a June 2, 1998, 24hr. composite sample and a June 3, 1998, composite sample were as follows:

PARAMETER	(PERMIT LIMIT)	COMPOSITE <u>JUNE 2, 1998</u>	COMPOSITE <u>JUNE 3, 1998</u>	GRAB <u>JUNE 3, 1998</u>
BOD	2,322 lbs/day	96 lbs/day	255 lbs/day	
TSS	1,557 lbs/day	214 lbs/day	125 lbs/day	
O & G	990 lbs/day	26 lbs/day	18 lbs/day	32 lbs/day
PHENOL	6.6 lbs/day	1.3 lbs/day	ND lbs/day	0.1 lbs/day
FLOW	Report	0.64 mgd	0.60 mgd	

On June 2, 1998, representatives from MDEQ arrived at our facility at 12:45p.m. and I met them in our reception room. When MDEQ informed me they were here to set out sampling equipment to sample our effluent, I formally requested a split sample if the results were to be used for compliance monitoring purposes. Those present when I requested a split sample were Mr. Errol White (MDEQ), Mr Chad Seymor (MDEQ), myself, and Mr. Bud Sumrall (HERCULES). There was some discussion about the amount of sample and if there would be enough. At that point I again formally requested a split sample if this were for compliance monitoring.

Mohammad Yassin
October 14, 1998
Page 2

On June 3, 1998, when the composite sample was picked up, we were not given enough sample to run bioassay testing. Therefore, we have no bioassay data from split sampling.

I have provided the data above to show that during this time period our effluent shows no abnormal characteristics. As well, we have reviewed our operational activities surrounding and during this time period and have found no indications of abnormal operations which might have resulted in the alleged toxicity.

Furthermore, we have since conducted our second quarter bioassay compliance monitoring on June 25, 1998, and the results of this testing were $LC(50) > 100\%$.

If I can answer any additional questions please call me at (601) 545-3450 ext 360.

Sincerely,

HERCULES INCORPORATED



Charles S. Jordan
Environmental Coordinator

cc: Walt Langhans
Plant Manager



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
FAX: (601) 584-3226
<http://www.herc.com>

October 19, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. Z-079-760-446

RECEIVED
OCT 26 1998
Dept. of Environmental Quality
Office of Pollution Control

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the September, 1998,
and our third quarter Bioassay results.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in black ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:

File
NPDES
Forest w



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

October 7, 1998

Charlie Jordan
613 West 7th Street
P. O. Box 1937
Hattiesburg, MS 39403-1937

Dear Mr. Jordan;

Re: Acute Toxicity Test
Hercules

Enclosed please find a copy of the Bioassay Report for samples taken at Hercules Inc. on June 4, 1998. This report indicates that Hercules is not in compliance with its permit conditions. Please inform our office in writing by October 20, 1998, of the cause of this violation.

Sincerely,

Mohammad Yassin, PE, CHMM



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
FAX: (601) 584-3226
<http://www.herc.com>

September 30, 1998

*File
Niles
Forrest L.*

Certified Mail - Return Receipt Requested
Cert. # P 443-543-658

RECEIVED
OCT - 2 1998
Dept. of Environmental Quality
Office of Pollution Control

Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, Ms. 39289-0385

Dear Mr. Yassin:

The purpose of this letter is to document our September 30, 1998, phone conversation. As a result of hurricane Georges, our plant operations were shutdown prior to the arrival of Georges. During this event we experienced a loss of power in certain areas as a result of the hurricane. During this loss of power we experienced lift station(s) overflow which contained only rainfall, since our entire operations had taken a prior shutdown. We also checked the wastewater treatment bypass valves to see that they were operational, but did not have to open the bypass during this event.

If I can answer any additional questions please call me at 601-545-3450, ext 360.

Sincerely,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

cc: Walt Langhans
Plant Manager

File
A.R.
Forest



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James L. Palmer, Jr., Executive Director

September 29, 1998

Charlie Jordan
613 West 7th Street
P. O. Box 1937
Hattiesburg, MS 39403-1937

Re: Hercules Inc.
Air CEI Report

Dear Mr. Jordan:

Enclosed please find our inspection report that was completed as a result of a Compliance Evaluation Inspection (CEI) at Hercules Inc. on September 14, 1998. This inspection revealed that the facility is in compliance with the Air Pollution Control permit conditions.

If you have any questions do not hesitate to contact me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE
Environmental Compliance and Enforcement Division

EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
	Equipment from each process area includes reactors, tanks, vents, piping, etc. Emissions from the process areas occur from their associated equipment and from fugitive losses.
AA-000	The Kymene process area produces specialty chemicals used primarily as wet strength additives in the manufacturing of paper.
AA-001	The Kymene process vent equipped with a packed bed water scrubber.
AA-002	The Kymene adipic acid handling system equipped with a dust shaker.
AA-003 and AA-004	Two (2) Kymene process storage tanks (Ref. no. K-411 and K-412), which are subject to NSPS, Subpart Kb.
AB-000	The Paracol process area produces specialty chemicals used primarily as sizing agents in the manufacturing of paper.
AB-001	The Paracol process vent equipped with a water scrubber.
AC-000	The Poly-Pale process area produces polymerized resin used primarily in adhesives and other resin derivatives.
AC-001	3.2 MMBTU/hr natural gas-fired Dowtherm Boiler.
AC-002	The Poly-Pale process vent equipped with a water scrubber (No.1).
AC-003	The Poly-Pale process vent equipped with a water scrubber (No.2).
AC-004	The Poly-Pale process melter.
AC-005	A Poly-Pale process storage tank (Ref. no. T-80), which is subject to NSPS, Subpart Kb.
AD-000	The Neuphor process area produces specialty chemicals used primarily as sizing agents in the manufacturing of paper.
AD-001	The Adduct Reactor process vent equipped with a carbon adsorption scrubber.
AD-002	The Dresinol process vent equipped with a water eductor.
AD-003	A process storage tank (NT-180) equipped with a water scrubber.
AE-000	The Metal Resinates process area produces specialty chemicals used in manufacturing publication gravure printing inks.
AE-001	The Metal Resinates process vent equipped with a total condenser.
AE-002, AE-003, and AE-004	Three (3) process storage tanks (Ref. no. S-125, S-126, S-127), which are subject to NSPS, Subpart Kb.
AF-000	The Rosin Amine Derivatives (RAD) process area produces chemicals used primarily as a corrosion inhibitor.

not in operation

out of service →

Solid, not in operation

Handwritten signature

Emission Point	Description
AF-001	8.3 MMBTU/hr natural gas-fired Dowtherm Boiler.
AF-002	The RAD process Ammoniation Vent.
AF-003	The RAD process Amine Vent.
AF-004	The RAD process vent equipped with a packed bed scrubber.
AG-000	The Hard Resins process area (HRA) produces chemicals used primarily in chewing gum and adhesives. The equipment can also be used to produce sizing agents used primarily in the manufacturing of paper.
AG-001	8.3 MMBTU/hr natural gas-fired Dowtherm Boiler.
AG-002	3.3 MMBTU/hr natural gas-fired Dowtherm Boiler.
AG-003	The HRA process kettle vent equipped with a water scrubber.
AG-004	The HRA process Continuous Esterification Vent.
AG-005	The HRA process Flaking Belt Dust Collector.
AH-000	The Rosin Shed process area produces drummed rosin for various end uses.
AI-000	The Staybelite process area produces resin derivatives.
AI-001	The Staybelite process hydrogenation separator vent.
AJ-000	The Rosin Distillation process area produces distilled rosin.
AJ-001	3.3 MMBTU/hr natural gas-fired Dowtherm Boiler.
AK-000	The Hydrogen Generation process area produces hydrogen and consists of: 1) natural gas catalytic cracking; 2) catalytic carbon monoxide conversion; 3) carbon dioxide, water, and caustic scrubbing; and 4) methane.
AK-001	21.0 MMBTU/hr natural gas-fired Hydrogen Furnace, which was installed prior to 1989.
AL-000	The Defoamer process area produces specialty chemicals used primarily in the manufacturing of paper.
AL-001	0.2 MMBTU/hr natural gas-fired Silica Furnace.
AL-002	The Defoamer process silica furnace dust collector.
AM-001	The 156.0 MMBTU/hr package boiler No. 5, which was installed prior to 1977 with the capability to burn natural gas, fuel oil #2, and fuel oil #6.
AM-002	The 65.0 MMBTU/hr package boiler No. 6, which was installed prior to 1989 with the capability to burn natural gas, fuel oil #2, and fuel oil #6.
AN-000	The Effluent Treatment process area consists of equalization, solids removal, pH adjustment, dissolved air floatation, neutralization, and activated carbon adsorption.
AN-001	The 2.95 MMBTU/hr natural gas-fired Carbon Regeneration Furnace equipped with a water scrubber.

Common Vent System

not in operation

not in operation

not in operation

not in operation

Mohamed Zia



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James L. Palmer, Jr., Executive Director

September 29, 1998

Charlie Jordan
613 West 7th Street
P. O. Box 1937
Hattiesburg, MS 39403-1937

Re: Hercules Inc.
CEI

Dear Mr. Jordan:

Enclosed please find our inspection report that was completed as a result of a Compliance Evaluation Inspection (CEI) at Hercules Inc. on September 14, 1998. This inspection revealed that the facility is in compliance with the NPDES permit conditions.

If you have any questions do not hesitate to contact me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE
Environmental Compliance and Enforcement Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

Science and Ecosystem Support Division
980 College Station Road
Athens, Georgia 30605-2720

24 SEP 1998

RECEIVED
SEP 28 1998
Dept. of Environmental Quality
Office of Pollution Control

Steve Spengler
Chief, Industrial NPDES Permit Section
MS Department of Environmental Quality
Office of Pollution Control
Environmental Permits Division
P.O. Box 10385
Jackson, Mississippi 39289-0385

SUBJ: Acute Toxicity Test Results for Hercules, Inc.
(NPDES #MS0001830)

Dear Steve:

At the request of the USEPA Water Management Division, acute toxicity tests were conducted on final effluent from Hercules, Inc., Hattiesburg, Mississippi. Tests were conducted on a composite sample of effluent from outfall 002 collected June 2-3, 1998 by Mississippi Department of Environmental Quality personnel and shipped to the USEPA Athens, Georgia laboratory. Acute toxicity tests were conducted June 4-6, 1998 on daphnids (*Ceriodaphnia dubia*) and June 4-8, 1998 on fathead minnows (*Pimephales promelas*) following procedures outlined in the USEPA manual "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" EPA/600/4-90/027F.

Toxicity tests were conducted according to instructions in the facility's NPDES permit. Definitive acute toxicity tests were conducted on a control, 100% effluent and a series of concentrations using a dilution factor of 0.5 from the 100% effluent. Control water used for both tests was a diluted mineral water. The 96-hour acute test was renewed at 48 hours with a portion of the original sample. The 48-hour daphnid acute test was not renewed.

Significant mortality occurred in both the daphnid and minnow tests. The statistical method used in analyzing the

survival data and determining the LC_{50} was the Trimmed Spearman-Kärber Method. A 48-hour LC_{50} of 9.1% for the daphnids and a 96-hour LC_{50} of 8.8% for the minnows was determined. The permit requirement is an LC_{50} greater than or equal to 10.7% of the effluent to pass. Both test results constituted a failure of the permit requirements.

A summary of test conditions, test results, and pertinent physical-chemical water quality data are included in the attached Tables 1-2.

If you have any questions, please call me at 706/355-8707.

Sincerely,



Kay Millar

Ecological Assessment Branch

cc: Loyd Sharp, MSDEQ

Table 1. Data Recorded During a 48-Hour, Daphnid Acute Static Toxicity Test Conducted on Effluent (Outfall 002) Collected 6/2-3/98 at Hercules, Inc., Hattiesburg, Mississippi, June 4-6, 1998.

Conc. Effluent	Number of Live Organisms			Dissolved Oxygen (mg/L)			Temperature (°C)			Initial Water Quality						
										pH (SU)	Total Alk (mg/L)	Hardness (mg/L)	Conductivity (µmhos/cm)	Salinity (ppt)	TRC (mg/L)	
(%)	0	24	48	0	24	48	0	24	48							
0	20	20	20	8.4	—	7.9	25.0	25.0	24.8	8.3	81	92	194	0.0	0.01	
6.25	20	20	19	9.1	—	7.6	25.0	25.0	24.8	8.1	—	—	342	0.1	—	
12.5	20	20	2	8.6	—	7.6	25.0	25.0	24.8	8.0	—	—	482	0.2	—	
25	20	0	0	7.8	7.3	—	25.0	25.0	—	8.0	—	—	760	0.3	—	
50	20	0	0	7.5	7.3	—	25.0	25.0	—	8.0	—	—	1300	0.7	—	
100	20	0	0	7.1	7.3	—	25.0	25.0	—	8.0	127	44	2360	1.3	0.01	

Table 2. Data Recorded During a 96-Hour, Fathead Minnow Acute Static Renewal Toxicity Test Conducted on Effluent (Outfall 002) Collected 6/2-3/98 at Hercules, Inc., Hattiesburg, Mississippi, June 4-8, 1998.

Conc. Effluent	Number of Live Organisms					Dissolved Oxygen (mg/L)					Temperature (°C)					Initial Water Quality						
	(%) ¹	0	24	48	72	96	0	24	48	72	96	pH (SU)	Total Alk. (mg/L)	Hardness (mg/L)	Conductivity (µmhos/cm)	Salinity (ppt)	TRC (mg/L)					
		0	24	48	72	96	0	24	48	72	96											
0	20	20	20	20	20	20	8.4	8.3	8.7	8.4	8.1	25	24	24	24	24	8.3	81	92	194	0.0	0.01
6.25	20	18	17	16	16	16	9.1	8.1	8.5	7.9	8.0	25	24	24	24	24	8.1	--	--	342	0.1	--
12.5	20	16	9	8	4	4	8.6	7.9	8.1	6.0	7.8	25	24	24	24	24	8.0	--	--	482	0.2	--
25	20	0	0	0	0	0	7.8	5.3	--	--	--	25	24	--	--	--	8.0	--	--	760	0.3	--
50	20	0	0	0	0	0	7.5	4.1	--	--	--	25	24	--	--	--	8.0	--	--	1300	0.7	--
100	20	0	0	0	0	0	7.1	4.1	--	--	--	25	24	--	--	--	8.0	127	44	2360	1.3	0.01

¹ concentrations were renewed at 48 hours with original sample of effluent



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

Science and Ecosystem Support Division
980 College Station Road
Athens, Georgia 30605-2720

24 SEP 1998

MEMORANDUM

SUBJECT: Hercules, Inc., Hattiesburg, Mississippi
Acute Toxicity Test Results,
June 4-8, 1998, NPDES #MS0001830

FROM: Kay Millar *KM*
Science and Ecosystem Support Division
Ecological Assessment Branch

TO: Parvez Mallick
Mississippi State Coordinator
Water Management Division
Water Programs Enforcement Branch
Clean Water Act Enforcement Section

As requested by the Water Management Division, personnel from the SEDS Ecological Assessment Branch conducted acute toxicity tests on final effluent from the subject facility. Tests were conducted on a composite sample of effluent from outfall 002 collected June 2-3, 1998 by Mississippi Department of Environmental Quality personnel and shipped to the USEPA Athens, Georgia laboratory. Acute toxicity tests were conducted June 4-6, 1998 on daphnids (*Ceriodaphnia dubia*) and June 4-8, 1998 on fathead minnows (*Pimephales promelas*) following procedures outlined in the USEPA manual "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" EPA/600/4-90/027F.

Toxicity tests were conducted according to instructions in the facility's NPDES permit. Definitive acute toxicity tests were conducted on a control, 100% effluent and a series of

Table 1. Data Recorded During a 48-Hour, Daphnid Acute Static Toxicity Test Conducted on Effluent (Outfall 002) Collected 6/2-3/98 at Hercules, Inc., Hattiesburg, Mississippi, June 4-6, 1998.

Conc.. Effluent	Number of Live Organisms			Dissolved Oxygen (mg/L)			Temperature (°C)			Initial Water Quality					
	0	24	48	0	24	48	0	24	48	pH (SU)	Total Alk. (mg/L)	Hardness (mg/L)	Conductivity (µmhos/cm)	Salinity (ppt)	TRC (mg/L)
(%)	0	24	48	0	24	48	0	24	48						
0	20	20	20	8.4	--	7.9	25.0	25.0	24.8	8.3	81	92	194	0.0	0.01
6.25	20	20	19	9.1	--	7.6	25.0	25.0	24.8	8.1	--	--	342	0.1	--
12.5	20	20	2	8.6	--	7.6	25.0	25.0	24.8	8.0	--	--	482	0.2	--
25	20	0	0	7.8	7.3	--	25.0	25.0	--	8.0	--	--	760	0.3	--
50	20	0	0	7.5	7.3	--	25.0	25.0	--	8.0	--	--	1300	0.7	--
100	20	0	0	7.1	7.3	--	25.0	25.0	--	8.0	127	44	2360	1.3	0.01



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
FAX: (601) 584-3226
<http://www.herc.com>

September 15, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-657

SEP 18 1998

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the August, 1998.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in blue ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:

File
NPDES
Permit



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

August 3, 1998

Charlie Jordan
613 West 7th Street
P. O. Box 1937
Hattiesburg, MS 39403-1937

Re: Hercules
MS0001830

Dear Mr. Jordan;

Enclosed is a copy of the Compliance Monitoring Inspection (CMI) Report and sampling that was performed at Hercules on June 3, 1998. The results of this inspection should be used as a guide for complying with requirements and limitation as stated in your NPDES permit. The results indicate that the effluent was in compliance with the permit.

If you have any questions please call me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE

HERCULES

RECEIVED
JUL 22 1998
Dept. of Environmental Quality
Office of Pollution Control

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
FAX: (601) 584-3226
<http://www.herc.com>

July 20, 1998

*File under
Hazardous
Waste*

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Cert. No. P 443-543-651

Jeffery T. Pallas, Chief
South Enforcement and Compliance Section
RCRA Enforcement and Compliance Branch
United States Environmental Protection Agency
Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

Dear Mr Pallas:

Regarding your July 14, 1998, letter, please find our attached June 22, 1998, response to the two alleged violations addressed in the State's June 16, 1998, letter.

As noted in our June 22, 1998, response, review of both of these items was completed in June, 1998. If I can answer any additional questions please call me at 601-545-3450 ext. 360.

Very truly yours,

HERCULES INCORPORATED



Charles S. Jordan
Environmental Coordinator

CSJ/

Attachment:

cc: ✓ Don Watts, MDEQ
Walter D. Langhans, Plant Manager, Hercules
Lloyd Madden, Hercules



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUL 14 1998

4WD-RCRA

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

JUL 20 1998

Mr. Lloyd D. Madden, Safety & Training
Hercules Incorporated
613 West 7th Street
Post Office Box 1937
Hattiesburg, Mississippi 39403-1937

SUBJ: Resource Conservation and Recovery Act (RCRA) Inspection of Hercules
Incorporated: MSD 008 182 081

Dear Mr. Madden:

Please find enclosed a copy of the RCRA Compliance and Evaluation Inspection report prepared by the U.S. Environmental Protection Agency (EPA) following an inspection performed on June 9, 1998, at Hercules Incorporated, by EPA and the Mississippi Department of Environmental Quality.

Two violations of federal environmental regulations were discovered during the time of inspection.

Should you have any questions, please contact Mr. Carlos E. Merizalde, of my staff, at (404) 562-8606.

Sincerely,

Jeffrey T. Pallas, Chief
South Enforcement and Compliance Section
RCRA Enforcement and Compliance Branch

Enclosure

cc w/encl.: Don Watts, MDEQ

File
NPDES
Forward



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

June 29, 1998


Charlie Jordan
613 West 7th Street
P. O. Box 1937
Hattiesburg, MS 39403-1937

Dear Mr. Jordan;

Enclosed is a copy of the Compliance Monitoring Inspection Report and sampling that was performed at Hercules on January 28, 1998. The results of this inspection should be used as a guide for complying with requirements and limitation as stated in your NPDES permit. The results indicate that the effluent was in compliance with the permit.

If you have any questions please call me at (601) 961-5195.

Sincerely,


Mohammad Yassin, PE



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

June 18, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-562

RECEIVED
JUN 23 1998
Dept. of Environmental Quality
Office of Pollution Control

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the May, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

June 22, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-563

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Please find our response to the two alleged violations in your 06/16/1998 letter.

"262.34(c)(1), and 265.173(a): Containers holding hazardous waste must be closed during storage except when waste is added or removed."

The drum in question is a 55-gallon open-head drum we use to drain the "last drop" of paint from paint cans that are "empty" by definition, and thus exempt from the regulations. Over the years we have collected a couple of drums of paint "remains" and, therefore, have kept this material out of landfills. We understand that we are going beyond what is required by the regulations, but we believe this practice is a worthy cause. Our practice is to dispose of this material by incineration as a hazardous waste rather than go into expensive analysis that are sometimes more costly than the actual disposal cost of one drum of waste. In order to address the alleged violation without stopping this worthwhile cause, we will instruct both the paint area supervision and workers to keep the drum lid on the open-head drum at all times, except when the drum is in use. This review will be completed by the end of June, 1998.

"262.34(a)(4), and 265.52(e); The contingency plan must include a list of all emergency equipment at the facility, the location and physical description of each item, and a brief outline of each item's capability. The list must be kept up to date."

Mr. Mohammad Yassin
June 22, 1998
Page 2

Our plant's Emergency Response manual contains a list of emergency equipment. We will update the list to include the location, the physical description of each item, and a brief outline of each item's capability. This review will also be completed by the end of June, 1998.

If I can answer any additional questions please call me at 601 545-3450 ext 360.

Very truly yours,

HERCULES INCORPORATED



Charles S. Jordan
Environmental Coordinator

CSJ/vrf

cc: Walter D. Langhans, Plant Manager



RECEIVED
JUL 22 1998
Dept. of Environmental Quality
Office of Pollution Control

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
FAX: (601) 584-3226
<http://www.herc.com>

June 18, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. P-443-543-650

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Bioassay Monitoring Report for the second quarter, 1998.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:

FATHEAD MINNOW ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 06/27/98 TIME STARTED: 02:30 P.M. ANALYST: JDS

REP #	A				B			
	24	48	72	96	24	48	72	96
0%	0	0	0	0	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	0	0	0	0	0	0	0	0
25%	0	0	0	0	0	0	0	0
50%	0	0	0	0	0	0	0	0
100%	0	0	0	0	0	0	0	0

LABORATORY NOTES:

Test Method: 96-hr acute definitive bioassay
 Species: *Pimephales promelas* (fathead minnow)
 Age: <24hr-old
 No. Replicates: 2
 No. Organisms/Rep: 10
 No. Dilutions: 5 + control
 Sample I.D.: Final Ditch
 Date Initiated: 06/27/98

TOTAL DEAD (FOR LC₅₀ DETERMINATION):

0% - 0
 6.25% - 0
 12.5% - 0
 25% - 0
 50% - 0
 100% - 0

LC₅₀ > 100% (NO STATISTICS REQUIRED)

RAW DATA CERTIFIED BY:

Rick M. Sherrard

DATE:

7/12/98

***Ceriodaphnia dubia* ACUTE BIOASSAY**

CLIENT: HERCULES, INC. DATE STARTED: 06/27/98 TIME STARTED: 04:30 P.M. ANALYST: JDS

REP #	A		B		C		D	
	24	48	24	48	24	48	24	48
0%	0	0	0	0	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	0	0	0	0	0	0	0	0
25%	0	0	0	0	0	0	0	0
50%	0	0	0	0	0	0	0	0
100%	0	0	0	0	0	0	0	0

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay

Species: *Ceriodaphnia dubia* (water flea)

Age: <24hr-old

No. Replicates: 4

No. Organisms/Rep: 5

No. Dilutions: 5 + control

Sample I.D.: Final Ditch

Date Initiated: 06/27/98

TOTAL DEAD (FOR LC₅₀ DETERMINATION):

0%	-	0
6.25%	-	0
12.5%	-	0
25%	-	0
50%	-	0
100%	-	0

LC₅₀ > 100% (NO STATISTICS REQUIRED)

RAW DATA CERTIFIED BY:

Rick M. Alexander

DATE:

7/12/98



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
FAX: (601) 584-3226
<http://www.herc.com>

June 18, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-649

RECEIVED
JUL 22 1998
Dept. of Environmental Quality
Office of Pollution Control

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the June, 1998.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in dark ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

May 8, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-640

RECEIVED
MAY 11 1998
Dept. of Environmental Quality
Office of Pollution Control

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the April, 1998.

Very truly yours,

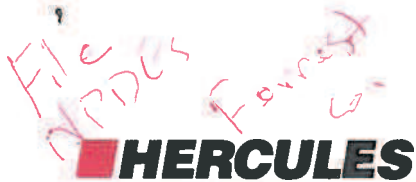
HERCULES INCORPORATED

A handwritten signature in black ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-193
(601) 545-3450
Fax: (601) 584-3226

May 8, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. P-443-543-639



Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

In reference to our previous phone message, the purpose of this letter is to inform you that on April 28, 1998, we exceeded our NPDES permit limit for both phenols and BOD. During heavy rainfalls which resulted in above average discharge, we exceeded our permit limit as shown below. The previous day, April 27, 1998, both phenol and BOD analyses were in compliance as was the following day, April 29, 1998. Our average wastewater flow is 0.7 MGD. On April 28, 1998, our flow rate was 1.37 MGD.

<u>DATE</u>	<u>PHENOL (lbs/day)</u>		<u>BOD (lbs/day)</u>	
	<u>Actual</u>	<u>Limit</u>	<u>Actual</u>	<u>Limit</u>
4/28/98	10.3	6.6	4776	2322

If I can answer any additional questions please call me at (601) 545-3450, ext. 360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

cc: Walter D. Langhans, Plant Manager



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

April 15, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-561

RECEIVED
APR 20 1998
Dept. of Environmental Quality
Office of Pollution Control

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for the 1st Quarter of 1998.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in dark ink, appearing to read "Charles S. Jordan", written over a faint circular stamp.

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:

***Ceriodaphnia dubia* ACUTE BIOASSAY**

CLIENT: HERCULES, INC. DATE STARTED: 03/13/98 TIME STARTED: 04:00 P.M. ANALYST: RMS

NUMBER DEAD								
REP #	A		B		C		D	
HOURS	24	48	24	48	24	48	24	48
0%	0	0	0	0	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	1	2	2	2	1	2	1	2
25%	5	5	5	5	3	5	4	5
50%	5	5	5	5	5	5	5	5
100%	5	5	5	5	5	5	5	5

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay
 Species: *Ceriodaphnia dubia* (water flea)
 Age: <24hr-old
 No. Replicates: 4
 No. Organisms/Rep: 5
 No. Dilutions: 5 + control
 Sample I.D.: Final Ditch
 Date Initiated: 03/13/98

TOTAL DEAD (FOR LC₅₀ DETERMINATION):

0% - 0
 6.25% - 0
 12.5% - 8
 25% - 20
 50% - 20
 100% - 20

LC₅₀ = 13.40% (Trimmed Spearman-Kärber Method)

RAW DATA CERTIFIED BY:

Rick M. Sherman

DATE:

4-8-98

FATHEAD MINNOW ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 03/13/98 TIME STARTED: 05:15 P.M. ANALYST: RMS

NUMBER DEAD								
REP #	A				B			
HOURS	24	48	72	96	24	48	72	96
0%	0	0	0	0	0	0	0	0
6.25%	0	0	2	2	0	0	0	0
12.5%	2	2	3	3	0	0	1	1
25%	9	10	10	10	10	10	10	10
50%	10	10	10	10	10	10	10	10
100%	10	10	10	10	10	10	10	10

LABORATORY NOTES:

Test Method: 96-hr acute definitive bioassay
 Species: *Pimephales promelas* (fathead minnow)
 Age: <24hr-old
 No. Replicates: 2
 No. Organisms/Rep: 10
 No. Dilutions: 5 + control
 Sample I.D.: Final Ditch
 Date Initiated: 03/13/98

TOTAL DEAD (FOR LC₅₀ DETERMINATION):

0% - 0
 6.25% - 2
 12.5% - 4
 25% - 20
 50% - 20
 100% - 20

LC₅₀ = 15.61% (Trimmed Spearman-Kärber Method)

RAW DATA CERTIFIED BY:

Rich M. Sheward

DATE:

4-8-98



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James I. Palmer, Jr., Executive Director

April 30, 1998

Charlie Jordan
613 West 7th Street
P. O. Box 1937
Hattiesburg, MS 39403-1937

Dear Mr. Jordan;

Enclosed is a copy of the Compliance Monitoring Inspection Report and sampling that was performed at Hercules on January 28, 1998. The results of this inspection should be used as a guide for complying with requirements and limitation as stated in your NPDES permit. The results indicate that the effluent was in compliance with the permit.

If you have any questions please call me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

April 15, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-636

RECEIVED
APR 20 1998
Dept. of Environmental Quality
Office of Pollution Control

Mr. Mohammad Yassin
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Yassin:

Attached is our EPA Discharge Monitoring Report for March, 1998.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in black ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:



MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

James L. Palmer, Jr., Executive Director

FORREST

April 15, 1998

Charlie Jordan
613 West 7th Street
P. O. Box 1937
Hattiesburg, MS 39403-1937

Re: Hercules Inc.
CEI

Dear Mr. Jordan:

Enclosed please find our inspection report that was completed as a result of a Compliance Evaluation Inspection (CEI) at Hercules Inc. on April 13, 1998. This inspection revealed that the facility is in compliance with the NPDES permit conditions.

If you have any questions do not hesitate to contact me at (601) 961-5195.

Sincerely,

Mohammad Yassin, PE



Hercules Inc.
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS
(601) 545-3450 3-1937
Fax: (601) 584-6

March 16, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-558

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

RECEIVED
MAR 19 1998
Dept. of Environmental Quality
Office of Pollution Control

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for February, 1998.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in black ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attached:



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

March 10, 1998

Certified Mail - Return Receipt Requested
CM#: P 443-543-556

WJ
Mr. Charles Cook
Bureau of Pollution Control
P. O. Box 10385
Jackson, Ms 39209-0385

RECEIVED
MAR 11 1998
Dept. of Environmental Quality
Office of Pollution Control

Dear Mr. Cook:

The purpose of this letter is to follow up our previous phone call. On 03/07/98, at approximately 6:30 p.m. during a heavy rainfall, approximately 4.1 inches over a 3 to 4 hour time period, we experienced equipment failure with one of our two pumps at # 5 lift station. As a result of this equipment malfunction a portion of the lift station's increased hydraulic load (predominantly rainfall) overflowed into stormwater runoff for approximately two hours. The pump malfunction was the result of the motor shorting out. The motor is scheduled for replacement on 3/10/98.

Also, during this same rainfall event, we estimate the following amount of primary wastewater bypassing secondary treatment in order to prevent basin overflow.

<u>DATE</u>	<u>FLOW</u>	<u>TOC</u>	<u>LBS/DAY</u>	<u>PERMIT LIMIT</u>
3/7/98	2,610 gpm x 55 min.	18mg/l	22	3,019

If I can answer any additional questions, please call me at 601-545-3450 ext. 360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

cc: Walter D. Langhans
Plant Manager



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

March 9, 1998

Certified Mail - Return Receipt Requested
CM# P-443-543-565

Mr. Charles Cook *WY*
Bureau of Pollution Control
P. O. Box 10385
Jackson, Ms 39289-0385

*File
Hercules
T-Orrrest Co.*

RECEIVED
MAR 11 1998
Dept. of Environmental Quality
Office of Pollution Control

Dear Mr. Cook:

RE: NPDES Permit No MS0001830

Please find the attachments addressing a storm water pollution study as required in other standard conditions. A total of twelve (12) sites have been identified to minimize the amount of storm water entering our industrial wastewater treatment system. We estimate the implementation of this study will remove approximately 5 acres of storm water. This removal, coupled with increased pump capacity of approximately 4,000 GPM, should minimize any bypassing potential as the result of heavy rainfall events.

If I can answer any additional questions please call me at 601-545-3450 ext 360.

Sincerely,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attachments:

cc: Walt Langhans w/o attachments



file to.

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

February 2, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-547



Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for January, 1998.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in black ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attachment:



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

January 19, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-545

Ms. Becky Williams
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Forest

Dear Ms. Williams:

Attached is our EPA Discharge Monitoring Report for December, 1997.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in black ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attachment:



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

January 19, 1998

RECEIVED
JAN 20 1998
Dept. of Environmental Quality
Office of Pollution Control

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P-443-543-545

Ms. Becky Williams
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Forest

Dear Ms. Williams:

Attached is our EPA Discharge Monitoring Report for the 4th Quarter of 1997.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in black ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attachment:



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

January 13, 1998

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P 443-543-544

RECEIVED
JAN 16 1998
Dept. of Environmental Quality
Office of Pollution Control

Ms. Becky Williams
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Forest

Dear Ms. Williams:

The purpose of this letter is to follow up on our January 8, 1998, phone conversation with Mr. Charles Cook.

On 1/5/98 and 1/7/98, we experienced an excessive amount of rainfall over a relatively short period of time. We received approximately 3.5 inches over a three hour period and approximately 5.4 inches over a 2 hour time period, respectively. We estimate the following amount of primary wastewater bypassing secondary treatment in order to prevent basin overflow:

<u>Date</u>	<u>Flow</u>	<u>TOC</u>	<u>lbs/day</u>	<u>Permit Limit</u>
1/5/98 (2,610 GPM x 140 min.)				
Bypass	0.37 MGD	20 mg/l	61	3,019
1/7/98 (2,610 GPM x 605 min.)				
Bypass	1.58 MGD	23 mg/l	303	3,019

If I can answer any additional questions, please call me at (601) 584-3360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan
Charles S. Jordan
Environmental Coordinator

CSJ/vrf

cc: W. D. Langhans, Plant Manager

HERCULES

RECEIVED
DEC 8 - 1997
Dept. of Environmental Quality
Office of Pollution Control

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

December 4, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P 443-543-543

Forest

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for November, 1997.

Very truly yours,

HERCULES INCORPORATED



Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attachment:



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

MEMORANDUM

To: Becky Williams

From: Doug Upton

Forest

Subject: Review of Hercules Incorporated Acute Toxicity Test - September 1997

Date: December 2, 1997

After careful review it appears that these tests were performed according to the correct EPA methodology.

If you, the permittee, or the contract lab have any questions regarding these tests please do not hesitate to contact me at (601)939-8553.

HERCULES

RECEIVED
NOV 13 1997
Dept. of Environmental Quality
Office of Pollution Control

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

November 12, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P 443-543-542

Forest

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for October, 1997.

Very truly yours,

HERCULES INCORPORATED



Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attachment:



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

October 9, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P 443-543-541

RECEIVED
OCT 16 1997
Dept. of Environmental Quality
Office of Pollution Control

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our semi-annual Bioassay Report for the period 97-04-01 to 97-09-30.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in black ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attachment:



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

October 8, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P 443-543-540

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Forrest

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for September, 1997.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in black ink, appearing to read "Charles S. Jordan".

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attachment:



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

October 1, 1997

CERTIFIED MAIL NO. Z-278-184-059

Charles Jordan, Environmental Manager
Hercules Incorporated,
613 West 7th Street
P.O. 10385
Hattiesburg, Ms. 39403-1937

Dear Mr. Jordan :

Re: ~~Permit Application No. MS0001830~~
Permit Application No. MS0001830

Enclosed is National Pollutant Discharge Elimination System (NPDES) Permit Number MS0001830, which is hereby to reissued. Please note the effluent limitations, schedule of compliance, monitoring requirements, and monitoring reporting dates found in this permit.

This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Sections 49-17-1, et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under the authority granted to the Mississippi Environmental Quality Permit Board pursuant to Section 402(b) of the Federal Water Pollution Control Act.

Any appeal of this permit action must be made within the 30 day period provided for in Section 49-17-29(4)(b) Mississippi Code of 1972.

Very truly yours,

Charles Cook, P.E.

Enclosure
CEC:cec
cc: Ann Parrish
SRO (w/enclosure)



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

September 8, 1997

Forrest

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P 443-543-538

RECEIVED
SEP 15 1997
Dept. of Environmental Quality
Office of Pollution Control

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for August, 1997.

Also, attached is a Certificate of Authority for our current plant manager.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attachment:

3800
4082
3/14/97



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
100 ALABAMA STREET, S.W.
ATLANTA, GEORGIA 30303-3104

file

FORREST CO

September 9, 1997

REF: 4WM-SWPFB

Mr. Barry Royals, Chief
Surface Water Division
Office of Pollution Control
Mississippi Department of
Environmental Quality
P.O. Box 10385
Jackson, MS 39289-0385

RECEIVED
SEP 12 1997
U.S. Environmental Quality
Office of Pollution Control

RE: NPDES Overview

Dear Mr. Royals:

In accordance with the EPA/MSDEQ MOA, we have completed review of the following draft permit(s) and have no objections to the proposed permit conditions.

<u>NPDES No.</u>	<u>Facility</u>
MS0001830	Hercules Incorporated
✓ MS0002950	Zapata Protein (USA), Inc.
MS0027847	SRWMD/Waveland Facility

We request we be afforded an additional review opportunity only if significant changes are made to the permit(s) prior to issuance, or if significant objections to the permit(s) are received. Otherwise, please send us one copy of the final permit(s) when issued.

If you have any questions, please call Marshall Hyatt at (404) 562-9304.

Sincerely,

Douglas F. Mundrick

Douglas F. Mundrick, P.E., Chief
Surface Water Permits and
Facilities Branch
Water Management Division

CERTIFICATE OF AUTHORITY

PURSUANT TO the provisions of the State of Mississippi and the United States Environmental Protection Agency environmental regulations, I, **Marshall Steinberg**, being a principal executive officer of **Hercules Incorporated** (herein "the **Corporation**") of at least the level of Vice President, do hereby certify that I have this day authorized and directed, as my duly authorized representative, the person designated below (being the individual having the responsibility for the overall operation of the regulated facility), to complete, sign, and submit, in the name of and on behalf of the **Corporation**, all environmental reports, requests for information or permit applications required by federal, state, and/or local issuing authorities. The authority for signing permit applications is being delegated contingent on the prior review and approval of such documents by the appropriate business Environmental Manager.

Authorized Representative:


Walter D. Langhans
Plant Manager
Hattiesburg, MS Plant

Regulated Facility:

Hercules Incorporated
Hattiesburg, MS

IN WITNESS WHEREOF I have hereunto affixed my signature on this 15th day of August, 1997.

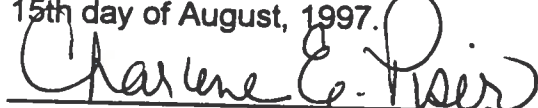
HERCULES INCORPORATED


Marshall Steinberg
Vice President
Health & Environment

STATE OF DELAWARE)

COUNTY OF NEW CASTLE)

SWORN TO and subscribed before me, a notary public in the county and state aforesaid, this 15th day of August, 1997.



Notary Public

CHARLENE E. PISER

NOTARY PUBLIC - DELAWARE

My commission expires April 10, 2001

My Commission expires: _____

August 15, 1997

Mr. Walter D. Langhans
Hercules Incorporated
Plant Manager
Hattiesburg Plant
Hattiesburg, Mississippi

RE: **Certificate of Authority**

Dear Mr. Langhans:

The attached Certificate of Authority has been executed by me re delegating to you as Hercules duly authorized representative authority to deal with appropriate federal, state and local authorities on environmental reports, requests for information and permit applications (where such delegation of authority is allowed by the applicable regulation).

This authority is being delegated with the specific understanding that such reports, requests for information and permit applications will be, in all respects, accurate and complete. The authority for signing permit applications is being delegated contingent on the prior review and approval of such documents by the appropriate business Environmental Manager. It is the policy of Hercules Incorporated to maintain full compliance with all laws and regulations and to be fair and factual in all of our dealings with regulatory authorities. In no way should you violate this trust which has been given to you to act as a representative of Hercules in your dealings with agencies.

Very truly yours,



Marshall Steinberg
Vice President
Health & Environment

cc: J. E. Bengé - 10
J. S. Bryce - 10
C. S. Jordan - Hattiesburg
T. S. Kavanaugh - 10
Letterbook Copy

C. D. Miller - 8
K. W. Patterson - 11
G. M. Trovei - 10
R. L. Williams - 8
FileCopy: Certificate of Authority

HERCULES

CHEMICAL SPECIALTIES

RECEIVED

AUG 15 1997

Dept. of Environmental Quality
Office of Pollution Control

August 12, 1997

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P 443-543-537

Forest

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for July, 1997.

Very truly yours,

HERCULES INCORPORATED



Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attachment:



File: Forrest

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

August 14, 1997

**Ms. Donna Reed-Judkins, NPDES Permit Engineer
Water Permits and Enforcement Branch
Water Management Division
U. S. Environmental Protection Agency
Region IV
345 Courtland Street, N. E.
Atlanta, Georgia 30365**

Dear Ms. Judkins:

**Re: Hercules Inc. Draft NPDES Permit No.
MS0001830 Submittal for EPA Review**

Enclosed herewith for your review are copies of the following documents related to the reissuance of the above referenced permit:

Draft Permit modified

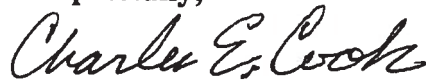
It is the judgement of this Bureau that the conditions and effluent limitations of this permit reflect a degree of technology equal to BAT.

The subject permit is scheduled to be Public Notice on August 15, 1997. One change was made in the permit. The maximum phenol limit was changed from 4.9 to 6.6 lbs per day. The average limit remained the same.

Ms. Donna Reed-Judkins,
August 14, 1997
Page-2-

If you have any questions regarding the enclosed packet, please do not hesitate to contact us.

Respectfully,

A handwritten signature in cursive script that reads "Charles E. Cook".

Charles E. Cook, P.E.

Enclosures
cc: Ann Parrish, OPC

Ad #: 00193163 Printed by: 303 on: 8/12/97 at: 11:19

Phone #: (601) 361-5171	Lines: 356	Net Cost: 29.48
Name: MS. Dept. Environmental	Depth: 7.28	Tot Paid: 0.00
Contact:	Size: 0 x 0.00	Charges: 1.00
PO #: Acct #: 30800	Adj: Adj?	Credits: 0.00
Address: PO Box 10395	Years? Y CC#?	Ordered: 1 Ran: 0
Address:	Box #:	I 303 08/12/97 11:04
City/St: Jackson	# of Edits: 00 E	
Zip: 39209-0385	Type: c Status: n	Sub'r: TF? K
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[iq]PUBLIC NOTICE-

Mississippi Environmental Quality-
Permit Board=
P.O.Box 10395=
Jackson, MS 39209=
Telephone No. (601) 961-5171=
August 15, 1997-

From: *Harriet Payne-ndp*
Barry Rogers

manufactures
To: _____

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Persons wishing to comment
not or object to the proposed
determinations are invited to

submit comments in writing to Jerry Cain at the Permit Board's address shown above, no later than September 15, 1997. All comments received by that date will be considered in the formulation of final determinations regarding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit.

Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing or calling Charles Cook at the Permit Board's address and telephone number shown above. Also, this and other information is available for review and copying during normal business hours at the Southport Center Building located at 2380 Highway 80 West, Jackson, MS.

Please bring the foregoing to the attention of persons whom you know will be interested.
August 15, 1997



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

TO: Postmaster

FROM: Mississippi Department of Environmental Quality, Office of Pollution Control

SUBJECT: Public Notice(s)

DATE: August 11, 1997

Please post the attached public notice(s) in your Post Office on or before August 14, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

HDP
Attachment



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

TO: Librarian

FROM: Mississippi Department of Environmental Quality, Office of Pollution Control

SUBJECT: Public Notice(s)

DATE: August 11, 1997

Please post the attached public notice(s) in your Library on or before August 14, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

HDP
Attachment



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

TO: Chancery Clerk

FROM: Mississippi Department of Environmental Quality, Office of Pollution Control

SUBJECT: Public Notice(s)

DATE: August 11, 1997

Please post the attached public notice(s) in your Courthouse on or before August 14, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

HDP
Attachment



FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

August 7, 1997

The Clarion Ledger
201 S. Congress
P. O. Box 40
Jackson, Mississippi 39205

Gentlemen:

Enclosed herewith are legal notices to be published in your newspaper on August 15, 1997.

Please furnish this office with statement and proof of publications in duplicate. If you have any questions, please contact Harriette Payne at 961-5121.

Very truly yours,

Barry S. Royals, P.E., Chief
Surface Water Division

BSR:hdp
Enclosure
cc: Ms. Pamela Mitchell (Division 1200)



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE COPY

August 7, 1997

Hattiesburg American
825 N. Main Street
Hattiesburg, Mississippi 39401

Gentlemen:

Re: Hercules Incorporated
Hattiesburg/Forrest

Enclosed herewith is a legal notice to be published in your newspaper on August 15, 1997.

Please furnish this office with statement and proof of publications in duplicate. If you have any questions, please contact Harriette Payne at 961-5121.

Very truly yours,

Barry S. Royals, P.E., Chief
Surface Water Division

BSR:hdp
Enclosure
cc: Ms. Pamela Mitchell (Division 1200)



file: Forest
Co

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

August 6, 1997

Charles Jordan, Environmental Manager
Hercules Incorporated,
613 West 7th Street
P.O. 10385
Hattiesburg, Ms. 39209

Dear Mr. Jordan:

Re: NPDES Permit No. MS0001830

Shortly the Mississippi Environmental Quality Permit Board will consider the reissuance of the referenced National Pollutant Discharge Elimination System (NPDES) Permit. The enclosed draft permit contains conditions which we intend to incorporate as part of your final permit. Also enclosed is a Public Notice dated June 1 which is the beginning of a 30-day comment period during which the general public's input and comments are invited. If you have not already done so, you are also invited to submit written comments by no later than August 30, 1997. A decision regarding the proposed issuance will be made by the Permit Board after all public comments have been duly considered.

Should you have any questions or wish to discuss this matter, please contact me at 601/961-5171.

Sincerely,

Charles E. Cook, P.E.
Industrial NPDES Section

CEC:cec
Enclosure



CHEMICAL SPECIALTIES

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

July 23, 1997

Certified Mail - Return Receipt Requested
No. P 443-543-534

Becky Ornelas
Industrial NPDES Section
State of Mississippi
Dept. Of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

RECEIVED
JUL 25 1997
Dept. of Environmental Quality
Office of Pollution Control

RE: NPDES Permit No. MS0001830
June 1997 DMR

Dear Ms. Ornelas:

Attached is the corrected Discharge Monitoring Report to which you referred in your letter of July 17, 1997.

Sincerely,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

Attachment:



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

July 17, 1997

FILE COPY

**Mr. Gerald Burch
Plant Manager
Hercules, Inc.
P.O. Box 1937
Hattiesburg, MS 39401-1937**

Dear Mr. Burch:

**Re: Hercules, Inc.
Forrest County-Hattiesburg
June 1997 DMR's
NPDES Permit No. MS0001830**

After careful review of your Discharge Monitoring Report for the June 1997, the following deficiencies were noted:

The frequency of analysis and sample type were not reported.

We request that you resubmit the Discharge Monitoring Reports with all parts filled out correctly on or before July 31, 1997. If you have any questions concerning this matter, do not hesitate to call me at 961-5171.

Very truly yours,

**Becky Ornelas
Industrial NPDES Section**

**BO:dht
Enclosures**



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

July 15, 1997

RECEIVED
JUL 16 1997
Dept. of Environmental Quality
Office of Pollution Control

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P 443 543 522

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for June 1997.

Following our previous phone conversation, G.C./M.S. analysis of retained samples indicate the apparent Phenol excursion on 6/4/97 to be 4-methyl Phenol.

Very truly yours,

Charles Jordan
Environmental Coordinator

CSJ/nb

Attachment



FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

July 9, 1997

Charles Jordan, Environmental Manager
Hercules Incorporated,
613 West 7th Street
P. O. Box 10385
Hattiesburg, MS 39209

Dear Mr. Jordan :

Re: Permit Application No. MS0001830

Hercules' comments dated June 26, 1997, are addressed as follows:

- 1) The receiving stream is a tributary of the Bowie River. This is based on our site visit and will not change.**
- 2) The 10.7% LC₅₀ is based on the flow rate of outfall 002.**
- 3a) Chronic Bioassay is required for effluent with an IWC of greater than one percent. This is the case with the limits on the 7Q10 = 0 stream.**
- 3b) The metals did not pass the Toxicity Screening and require additional sampling. This should have been in the previous draft.**
- 4) cmt noted, Acute bioassay requirements are used according to our regulations and toxicity matrix.**
- 5) cmt noted, Acute bioassay requirements are used according to our regulations and toxicity matrix.**
- 6a) same as reply for comment no.1**
- 6b) The 935,655 lbs of production was taken from the permit application.**
- 6c) The proposed limit for phenol is based on the past permit. This limit can not be changed due to the anti-backsliding rule. The only way we can adjust the limit is if you can illustrate how the process has changed from the past permitting period to cause an increase in phenol.**
- 6d) The TOC requirement is based on the last permit and will remain.**

Mr. Charles Jordan
July 9, 1997
Page - 2-

Hercules' comments dated April 29, 1997, are addressed as follows:

- 1) It is agreed to grant 3 years to comply with the limits required by the 7Q10 = 0 stream.
- 2) Your request for a pH limit of 6.0-9.0 S.U. will require a stream study. As we have discussed, you preferred the 6.5 - 9 pH limit over doing a stream study.
- 3) Your request for usage of monthly production numbers for categorical limit determination has been addressed for BOD5 and TSS.

We consider the changes to be more stringent than the requirements in the draft for public notice. Enclosed is a copy of the final draft.

Please provide comments no later than July 16, 1997. If you have any questions, please do not hesitate to contact me at 961-5171.

Sincerely ,



Charles Cook, P.E.
Industrial NPDES Section

CEC:dht
Enclosure

memo to file

7/7/97

Subject: Hercules, permit No. MS0001830, changes to public notice draft.

The draft was changed to correct the acute toxicity limit from 3% to 10.7%. The outfall 001 was changed to outfall 002 for the purpose of testing the entire effluent. These changes are more stringent and do not require a public notice to be re-advertised. Also the monitoring requirement for TOC has been reduced to once per month.

CEC:cec

HERCULES

CHEMICAL SPECIALTIES

RECEIVED
JUN 30 1997
Dept. of Environmental Quality
Office of Pollution Control

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
No. P 443 543 529

June 26, 1997

Mr. Charles E. Cook, P. E.
Industrial Wastewater Control Branch
Office of Pollution Control
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

RE: Hercules Incorporated
NPDES Permit No. MS0001830
Comments on Draft Permit

Dear Mr. Cook:

In your letter of January 9, 1997, the industrial NPDES section forwarded to Hercules a proposed draft NPDES permit.

As you are aware, Hercules participated in a series of conferences with the Office of Pollution Control subsequent to the January 9, 1997, letter. Among other issues, Hercules and DEQ focused on the issue of the "first receiving waters". For example, in the current permit issued October 22, 1991, Hercules has been granted permission to discharge wastewater into the Bouie River.

By letter of April 29, 1997, a copy of which is attached, I wrote to you providing additional comments on the draft permit of January 9, 1997.

We respectfully request that the Department of Environmental Quality and the Permit Board consider the following comments, among others:

1. The first receiving waters should be described as "the Bouie River" for the interim 3 year period from the date of permit issuance.
2. PART 1, A, 5, page 2 of 24; Comment: While acute bioassay requirements were a part of the January 9, 1997 draft, the effluent limitations and monitoring

requirements did not contain the provision "the LCD₅₀ shall pass a less than or equal to 3% of the effluent". Although the acute bioassay requirements were contained in Part III of the January 1997 draft, these requirements related only to outfall 002. There is no rationale or prior discussion for the insertion of these requirements at outfall 001.

3. PART 1, A, page 4 of 24 (Outfall 001-3 years after permit issuance, and lasting until 2002): There is no explanation or prior discussion for the following:
 - (a) The addition of chronic bioassay requirements; and
 - (b) The inclusion of sampling for aluminum, boron, nickel, selenium and zinc.
4. PART III: There is no explanation or prior discussion for the insertion of additional language in Part III, D - Other standard conditions - relating to acute biomonitoring and chronic biomonitoring. These additional provisions did not appear in the January 9, 1997 draft permit.
5. PART III - Chronic Bioassay Requirements: In the January 9, 1997, draft, there was no provision or prior discussion relating to chronic bioassay requirements. There does not appear to be an explanation for the inclusion of chronic bioassay requirements at outfall 001 as part of the effluent limitations and monitoring requirements for the period of three years after permit issuance and lasting until 2002.
6. Permit Rationale:
 - (a) Paragraph IV - Receiving waters should use the designation "the Bouie River" rather than an unnamed tributary of the Bouie River for the interim 3 year period from the date of permit issuance.
 - (b) Paragraph X(1)(B) - The factor used should be $1,247,642 / 1,292,400 = 0.965$.
 - (c) Paragraph X(d) - As you are aware, our phenol limits are on the order of magnitude 60 times more stringent than the current State water quality for the interim 3 years. As you know, we have difficulty even without manufacturing phenolic resins. We request some relief. Double current limits, which would still be much more stringent than State water quality standards.

Mr. Charles E. Cook, P. E.
June 26, 1997
Page 2

- (d) Paragraph XI - Drop TOC analysis requirements, since they are an order of magnitude 10 times higher than BOD.

We sincerely appreciate your considering the above comments in the review process.

Very truly yours,

HERCULES INCORPORATED



Charles S. Jordan
Environmental Coordinator

CSJ/vrf

cc: Douglas A. Cox, Plant Manager

Enclosure:



RECEIVED
JUN 17 1997
Dept. of Environmental Quality
Office of Pollution Control

Forrest Co.

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. P 443 543 527

June 11, 1997

Mr. Charles Cook
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Following our recent phone conversation, please find the following information relative to the maintenance of our carbon regeneration furnace water scrubber associated with our NPDES wastewater treatment permit.

Because of the deteriorated condition of the Sly scrubber, we are replacing it with a more efficient Fisher-Klosterman scrubber.

If I can answer any additional questions please call me at 601-545-3450, ext. 360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

cc: B. J. Hailey - OPC

Attachment:



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE COPY

May 27, 1997

Hattiesburg American
825 N Main Street
Hattiesburg, Mississippi 39401

Gentlemen:

Re: Hercules
Hattiesburg/Forrest

Enclosed herewith is a legal notice to be published in your newspaper on June 1, 1997.

Please furnish this office with statement and proof of publications in duplicate. If you have any questions, please contact Harriette Payne at 961-5121.

Very truly yours,

Barry S. Royals, P.E., Chief
Surface Water Division

BSR:hdp
Enclosure
cc: Ms. Pamela Mitchell (Division 1200)



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE COPY

May 27, 1997

The Clarion Ledger
201 S. Congress
Jackson, Mississippi 39205

Gentlemen:

Re: Condea Vista
Aberdeen/Monroe
Hercules
Hattiesburg/Forrest
Kerr McGee
Hamilton/Monroe
Prestage Farms, Inc. PM-3 & PM-4
Pheba/Clay
Prestage Farms, Inc. PM-1, PM-2 & Isolation #4
Crawford/Lowndes

Enclosed herewith are legal notices to be published in your newspaper on June 1, 1997.

Please furnish this office with statement and proof of publications in duplicate. If you have any questions, please contact Harriette Payne at 961-5121.

Very truly yours,

Barry S. Royals, P.E., Chief
Surface Water Division

BSR:hdp
Enclosure
cc: Ms. Pamela Mitchell (Division 1200)



HERCULES
FORREST

FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

TO: Postmaster

FROM: Mississippi Department of Environmental Quality, Office of Pollution Control

SUBJECT: Public Notice(s)

DATE: May 27, 1997

Please post the attached public notice(s) in your Post Office on or before June 1, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

**HDP
Attachment**



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

TO: Librarian

FROM: Mississippi Department of Environmental Quality, Office of Pollution Control

SUBJECT: Public Notice(s)

DATE: May 27, 1997

Please post the attached public notice(s) in your Libraray on or before June 1, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

HDP
Attachment



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

FILE COPY

TO: Chancery Clerk

FROM: Mississippi Department of Environmental Quality, Office of Pollution Control

SUBJECT: Public Notice(s)

DATE: May 27, 1997

Please post the attached public notice(s) in your Courthouse on or before June 1, 1997.

If you are unable to do so or if you have any questions, please contact Harriette Payne at (601) 961-5121.

HDP
Attachment



CHEMICAL SPECIALTIES

Certified Mail -Return Receipt Requested
#Z 079 760 448

Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

The purpose of this letter is to document previous discussions related to the first draft of our upcoming NPDES permit renewal.

As you are aware, our management intentions are to eventually discharge our industrial effluent to the city POTW as soon as the logistics can be finalized to everyone's satisfaction. Following this scenario and previous discussions, we will have a "two part" permit. The first part will essentially be a renewal of our existing permit and the second part will address discharging our contaminated industrial wastewater to the city POTW.

Based on the above rationale, we respectfully request the following:

We request that the first part of the permit, as was originally agreed to, be a full three years from the time of permit reissuance. This is to allow us time to work with the city to physically place our effluent into either a dedicated line or into the city's existing system.

We request, in order to be consistent with past precedent, that the pH limits in the permit remain 6.0 to 9.0, as prescribed in the applicable categorical effluent guidelines.

We request, in order to be consistent with past precedent, that the discharge limitations in the first part of the permit be based on actual monthly production quantities reported in the original permit application for the following reason. These production quantities are reported on page 2 of 4(B) in the original permit application and are consistent with the past rationale for developing our permit discharge limitations based on existing categorical effluent guidelines. Because of our cyclic production based on supply and demand, we believe this approach best represents our diversified operations, and again, is consistent with past rationale.

If I can answer additional questions, please call me at (601) 545-3450, extension 360.

Very truly yours,
HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

cc: Gerald Burch

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

RECEIVED
MAY - 2 1997
Dept. of Environmental Quality
Office of Pollution Control

File Hercules, Forrest Co.

HERCULES

CHEMICAL SPECIALTIES

April 29, 1997

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

Certified Mail -Return Receipt Requested
#Z 079 760 448

Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

The purpose of this letter is to document previous discussions related to the first draft of our upcoming NPDES permit renewal.

As you are aware, our management intentions are to eventually discharge our industrial effluent to the city POTW as soon as the logistics can be finalized to everyone's satisfaction. Following this scenario and previous discussions, we will have a "two part" permit. The first part will essentially be a renewal of our existing permit and the second part will address discharging our contaminated industrial wastewater to the city POTW.

Based on the above rationale, we respectfully request the following:

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We request, in order to be consistent with past precedent, that the pH limits in the permit remain 6.0 to 9.0, as prescribed in the applicable categorical effluent guidelines.

We request, in order to be consistent with past precedent, that the discharge limitations in the first part of the permit be based on actual monthly production quantities reported in the original permit application for the following reason. These production quantities are reported on page 2 of 4(B) in the original permit application and are consistent with the past rationale for developing our permit discharge limitations based on existing categorical effluent guidelines. Because of our cyclic production based on supply and demand, we believe this approach best represents our diversified operations, and again, is consistent with past rationale.

If I can answer additional questions, please call me at (601) 545-3450, extension 360.

Very truly yours,
HERCULES INCORPORATED



Charles S. Jordan
Environmental Coordinator

cc: Gerald Burch



*Quoted
Accepted*

PH-433-O (Rev.#7)

July 27, 1984

Hercules, Inc.
P.O. Drawer 1937
Hattiesburg, MS 39401

Attention: Mr. Jeff Brown

Inquiry 042-117-83, Suppl. 2
Sly IMPINJET Gas Scrubber
For Carbon Regeneration Furnace
Job 006614

Gentlemen:

We thank you for your continued interest in Sly's Scrubbers and for the opportunity to submit this revision to our recent proposals. This revision supersedes our previous quotations. The following confirms our telephone conversation of July 27, 1984.

We understand that the proposed scrubber is to collect 19 lb/hr of carbon from 8055 ACFM at 535°F. consisting of 17,467 lb/hr dry gas and 1121 lb/hr of water vapor from a Westvaco Fluidized Bed Carbon Regeneration Furnace. Our calculations show that if normal quantities of water (25 GPM total) are employed, the outlet would be 5480 ACFM at 140°F. saturated including 2672 lb/hr water vapor.

We are pleased to guarantee that the proposed scrubber will provide the requested 95% efficiency as long as the incoming particles are no finer than the given 80% below 50 microns and 20% between 50 microns to 1/16 inch. Sly's very conservative curves predict over 98.75% on the given particle size distribution.

We calculate that the fan will have to deliver the 5480 ACFM and a static pressure of 10.4" at conditions (13" SP at start up). Since Westinghouse does not suggest using a 426M Industrial Fan for less than 9000 CFM at 15" SP, we would not use the existing fan and we are quoting a smaller fan selected so that the desired delivery is on the appropriate portion of the fan curve.

MSPERF

HERCULES, INC FKP 95-0747, REV 1 8-23-95 RDC
PAGE 1 OF 1 PAGE(S)

Fisher-Klosterman MS-350-M
SCRUBBER PERFORMANCE

GAS FLOW CONDITIONS AT SCRUBBER INLET
GAS FLOW RATE, A.C.F.M.: 5506.0
GAS DENSITY, LBS./CU. FT.: 0.0611
GAS VISCOSITY, LBS.(MASS)/FT.-SEC.: 0.12077E-04

PARTICULATE CONDITIONS AT SCRUBBER INLET
PARTICULATE SPECIFIC GRAVITY: 1.500

THE WATER FLOW RATE IS 4.000 GAL./1000A.C.F.

SCRUBBER SELECTION AND PERFORMANCE
SCRUBBER TYPE AND SIZE: MS- 350-M
NUMBER IN PARALLEL: 1
CIRCULATING LIQUID RATE: 4.0 GAL./1000A.C.F.
PRESSURE DROP, INCHES W.C.: 6.50
GAL/A.C.F. ABOVE AT 40 PSI MINIMUM AT DELIVERY WITH
LESS THAN 2% SUSPENDED SOLIDS.

NOTE: UNLESS QUOTED pH CONTROL BY OTHERS

FRACTIONAL EFFICIENCY CURVE:
STOKES EQUIV. % EFFICIENCY
DIA., MICRONS BY WEIGHT

0.70	19.81
0.80	27.28
0.90	34.98
1.00	42.57
1.10	49.83
1.20	56.60
1.30	62.78
1.40	68.34
1.50	73.26
1.60	77.56
1.90	81.63
2.20	87.14
2.60	92.07
3.20	96.21
4.90	99.54

- NOTES: 1. LIQUID RATE DOES NOT INCLUDE EVAPORATION LOSSES.
2. PERFORMANCE IS BASED ON PARTICLE SIZES EXPRESSED
IN STOKES EQUIVALENT DIAMETERS AS DETERMINED
BY THE BAHCO MICRO-PARTICLE CLASSIFIER AS SPECIFIED



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

June 13, 1997

FORREST
FILE COPY

Mr. Gerald Burch
Plant Manager
Hercules, Inc.
P. O. Box 1937
Hattiesburg, MS 39401-1937

Dear Mr. Burch:

Re: Hercules, Inc.
Forrest County-Hattiesburg
Compliance Inspection Report
NPDES Permit No. MS0001830

Review of your Discharge Monitoring Report for May 1997, indicates that the frequency of analysis and sample type were not reported. Enclosed is the original Discharge Monitoring Report. We request that you resubmit the corrected report to this office on or before June 26, 1997. If you have any questions concerning this matter, do not hesitate to call me at 961-5171

Very truly yours,

Becky Ornelas
Industrial NPDES Section

BO:dht
Enclosures



CHEMICAL SPECIALTIES

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
P 443 543 526

RECEIVED
JUN 12 1997
Dept. of Environmental Quality
Office of Pollution Control

June 11, 1997

Mr. Charles Cook
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for May, 1997. In addition, the signed Certificate of Authority for Douglas A. Cox has been attached.

Very truly yours,

HERCULES INCORPORATED

A handwritten signature in cursive script that reads "Charles Jordan" followed by a stylized "vj" monogram.

Charles Jordan
Environmental Coordinator

CSJ/vrf

Attachment:



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

May 12, 1997

RECEIVED
MAY 15 1997
Dept. of Environmental Quality
Office of Pollution Control

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z 079 760 406

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for April 1997.

Very truly yours,

A handwritten signature in black ink, appearing to read "Charles Jordan", written over a faint, larger outline of the same signature.

Charles Jordan
Environmental Coordinator

CSJ/nb

Attachment



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

May 1, 1997

Mr. Gerald Burch
Plant Manager
Hercules, Inc.
P.O. Box 1937
Hattiesburg, MS 39401-1937

FILE COPY

Dear Mr. Burch:

Re: Hercules, Inc.
Forrest County-Hattiesburg
Compliance Inspection Report
NPDES Permit No. MS0001830

Enclosed is a copy of the NPDES Compliance Monitoring Inspection Report and sampling that was performed at Hercules, Inc. on March 31, 1997. The results of this inspection should be used by you as a guide for complying with requirements and limitations as stated by your NPDES permit. The sampling results indicate that the effluent was in compliance with your NPDES permit limits.

If you have any questions concerning this matter, please contact me at 961-5171.

Respectfully,

Becky Ornelas
Industrial NPDES Section

BO:bo
Enclosures

cc: Mr. Arthur Collins, EPA (w/ enclosures)
SRO
Mr. Paul Zetterholm (w/ enclosures)



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

Forest

April 25, 1997

RECEIVED
APR 29 1997
Dept. of Environmental Quality
Office of Pollution Control

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
No. Z 079 760 444

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our semi-annual EPA Discharge Monitoring Report for Bioassay monitoring.

Very truly yours,

A handwritten signature in black ink, appearing to read "Charles Jordan".

Charles Jordan
Environmental Coordinator

CSJ/nb

Attachment

Ceriodaphnia dubia ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 03/26/97 TIME STARTED: 9:15 P.M. ANALYST: RMS

NUMBER DEAD								
REP #	A		B		C		D	
HOURS	24	48	24	48	24	48	24	48
0%	0	0	0	0	0	0	0	0
6.25%	0	0	0	0	0	0	0	0
12.5%	0	0	0	0	0	0	0	0
25%	0	0	0	0	0	0	0	0
50%	0	0	0	0	0	0	0	0
100%	0	0	0	0	0	0	0	0

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay

Species: *Ceriodaphnia dubia* (water flea)

Age: <24hr-old

No. Replicates: 4

No. Organisms/Rep: 5

No. Dilutions: 5 + control

Sample I.D.: Final Ditch

Date Initiated: 3/26/97

TOTAL DEAD (FOR LC₅₀ DETERMINATION):

0% - 0
6.25% - 0
12.5% - 0
25% - 0
50% - 0
100% - 0

LC₅₀ > 100%

RAW DATA CERTIFIED BY:

Rich M. Leonard

DATE:

4/23/97

FATHEAD MINNOW ACUTE BIOASSAY

CLIENT: HERCULES, INC. DATE STARTED: 03/26/97 TIME STARTED: 10:45 P.M. ANALYST: RMS

NUMBER DEAD								
REP #	A				B			
HOURS	24	48	72	96	24	48	72	96
0%	0	0			0	0		
6.25%	0	0			0	0		
12.5%	0	0			0	0		
25%	0	0			0	0		
50%	0	0			0	0		
100%	0	0			0	0		

LABORATORY NOTES:

Test Method: 48-hr acute definitive bioassay
 Species: *Pimephales promelas* (fathead minnow)
 Age: <24hr-old
 No. Replicates: 2
 No. Organisms/Rep: 10
 No. Dilutions: 5 + control
 Sample I.D.: Final Ditch
 Date Initiated: 3/26/97

TOTAL DEAD (FOR LC₅₀ DETERMINATION):

0% - 0
 6.25% - 0
 12.5% - 0
 25% - 0
 50% - 0
 100% - 0

LC₅₀ = > 100%

RAW DATA CERTIFIED BY:

Rich M. Shuman

DATE:

4/23/97



CHEMICAL SPECIALTIES

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

Certified Mail
Return Receipt Requested
Z 079 760 363

April 18, 1997

RECEIVED
APR 22 1997
Dept. of Environmental Quality
Office of Pollution Control

Wm. Stephen Spengler, P.E., Chief
Industrial NPDES Section
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Spengler:

Please find the following response to your letter request of April 11, 1997.

I have enclosed previous correspondence with Mrs. Ashford and her attorney. I trust this satisfies your request. If I can answer any additional questions or provide additional information, please call me at 545-3450 ext. 360.

Very truly yours,

HERCULES INCORPORATED

Charles S. Jordan
Environmental Coordinator

CSJ/vrf

cc: Gerald Burch
Rich Williams
Louie Ruffin



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

April 18, 1997

Certified Mail - Return Receipt Requested
Z 079 760 443

Forest

RECEIVED
APR 21 1997
Dept. of Environmental Quality
Office of Pollution Control

Becky L. Ornelas
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Becky:

Following our recent phone conversation, please find the additional information.

Attached is the corrected DMR report preprinted date which reflects the correct monitoring period as indicated in the original submittal cover letter. Please excuse any inconvenience this may have caused.

If I can answer any additional questions, call me at 601-545-3450, Ext. 360.

Very truly yours,

A handwritten signature in black ink, appearing to read "Charles Jordan".

Charles Jordan
Environmental Supervisor

CJ:nb



FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

MEMORANDUM


TO: Dwight Wylie
FROM: Steve Spengler
THROUGH: Barry Royals, Jerry Cain
SUBJECT: Hercules Complaint
DATE: April 14, 1997

During the past two weeks, I have had several telecons with Ms. Willie Merle Ashford, who lives near the Hercules facility in Hattiesburg. According to Ms. Ashford, there was an odorous release into the air from a large bulk tank at Hercules during the month of October, 1996. According to Ms. Ashford, her house is now contaminated, and she is now suffering health problems(respiratory), as a result of this incident. She claims the odor was so bad in her house that she could not reside in it until January, 1997. She wants someone to decontaminate her house or, at least sample it to find out what the problem is.

I have contacted the Air Division and Hazardous Waste Division to determine if they were aware of any unusual incidents during this timeframe. They were not aware of anything. I also contacted Charlie Jordan, Environmental Manager, with Hercules. He indicated that he was aware of Ms. Ashford's complaints and that her lawyer and Hercules' lawyer were in correspondence. Charlie indicated that their 5 million gallon storage tank may have been the source of this problem, as it was being cleaned out during this period. This tank holds primary treated wastewater prior to carbon adsorption.

~~Yesterday~~ ^{last week}

I talked with Lydia Rogers, with Trent Lott's office, regarding this complaint. Ms. Rogers indicated that Ms. Ashford is calling daily to find out what is being done to address this situation. I have responded to both that we cannot require Hercules to "clean" this house, and it is difficult for us to determine the extent of the problem, since our office was not notified until 5 months after the alleged incident took place. I did tell them that I was preparing a letter to Hercules informing them of the allegation and requesting that they respond.



While I understand the Air Division takes the position that they do not regulate emissions from wastewater treatment systems, we need your assistance or guidance in addressing this situation, as I am sure your Division has addressed this type of situation in the past.

Enclosed, find a copy of the letter that is being transmitted to Hercules. We would appreciate a timely response. Thanks.



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

April 14, 1997

RECEIVED
APR 22 1997
Dept. of Environmental Quality
Office of Pollution Control

CERTIFIED MAIL - RETURN RECEIPT REQUESTED


No. Z 079 760 442

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for March 1997.

Very truly yours,


Charles Jordan
Environmental Coordinator

CSJ/nb

Attachment



FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

April 11, 1997

CERTIFIED MAIL NO. Z 732 437 517

Mr. Charles Jordan
Hercules, Inc.
P. O. Box 1937
Hattiesburg, Mississippi 39403-1937

Dear Mr. Jordan:

Re: Complaint Investigation

Our office is investigating a complaint which we recently received regarding an allegation that an odorous release into the air from Hercules occurred during October 1996. The complainant alleges that the odors were released from a tank on Hercules' property, and has contaminated their residence, and resulted in health problems. I have discussed this issue with our Air Division as well as our Emergency Response Branch. Neither of these have any records of complaints or notifications regarding any unusual events at Hercules during that time frame. The complainant indicated that Hercules was notified of this situation when the alleged release occurred.

We request that Hercules inform our office of any situations at the site which might have resulted in any unusual odors, and if so, what remedial actions have been taken to preclude this from happening in the future.

Mr. Charles Jordan
April 10, 1997
Page -2-

Please respond to this letter in writing within 10 days of receipt. If you have any questions, do not hesitate to contact me.

Sincerely,

Wm. Stephen Spengler, P. E., Chief
Industrial NPDES Section

WSS:dht

cc: Mr. Jerry Banks, OPC
Mr. Wayne Anderson, OPC
bc: Ms. Willie Merle Ashford
Ms. Lydia Rogers, Office of Senator Trent Lott



CHEMICAL SPECIALTIES

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

March 27, 1997

Certified Mail - Return Receipt Requested
Z 079760358

Robert C. Arledge, Esq.
Schwartz & Associate, P.A.
P. O. Box 3949
Jackson, MS 39207

Dear Mr. Arledge:

In reference to your letters of December 10, 1996, and March 5, 1997, a response to the December 10 letter was prepared for mailing on February 17. However, due to an administrative error, the mailing of the letter never occurred. It is enclosed. I apologize for the delay.

Very truly yours,

A handwritten signature in black ink, appearing to read "G.D. Burch", written over a horizontal line.

Gerald D. Burch
Plant Manager

GDB/vrf

Enclosures:

cc: Dorrance Aultman, Esq. - Aultman, Tyner, McNeese, Ruffin & Laird, Ltd.



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

March 20, 1997

RECEIVED
MAR 27 1997
Dept. of Environmental Quality
Office of Pollution Control

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

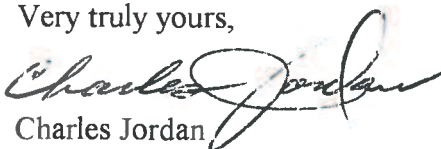
No. Z 079 760 424

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for February 1997.

Very truly yours,


Charles Jordan
Environmental Coordinator

CSJ/nb

Attachment

Schwartz & Associates, P.A.

Attorneys at Law

Richard B. Schwartz
David G. Galyon
Neil A. Mabry*
Robert C. Arledge*
B. Kendall Griffin

Telephone (601) 353-1215
(800) 844-1215
Fax (601) 948-3822

Physical Address:
134 East Amite Street
Jackson, Mississippi 39201

Mailing Address:
P.O. Box 3949
Jackson, Mississippi 39207

*also licensed in Texas
*also licensed in Louisiana

March 5, 1997

Hercules, Inc.
Gerald Birch, Plant Manager
613 West 7th Street
Hattiesburg, Mississippi 39401

Re: Arthur and Willie Ashford v. Hercules, Inc.

Dear Mr. Birch:

Several weeks ago we sent you a letter advising you of our representation of the captioned claimants. To date we have had no response from Hercules, Inc. We'd greatly appreciate it if you or your legal department would contact us at your earliest convenience so that we might discuss this matter.

If you have any questions regarding this claim, please do not hesitate to contact me.

Yours Very Truly,



Robert C. Arledge

RCA/jdm

cc: Willie Ashford
Arthur Ashford

**BUTLER, SNOW,
O'MARA, STEVENS
& CANNADA, PLLC**

ATTORNEYS AT LAW

17TH FLOOR
DEPOSIT GUARANTY PLAZA
210 EAST CAPITOL STREET
JACKSON, MISSISSIPPI 39201
POST OFFICE BOX 22567
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SELYA A. IRELAND
WILLIAM M. GAGE

file: Forrest Co.
Hercules.

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GEO. BUTLER (1948)
J. MORGAN STEVENS (1951)
CHAS. B. SNOW (1960)
JUNIOR O'MARA (1986)

March 5, 1997

Writer's Direct Number
(601) 949-4534

JohnCrawford@BSOSC.com

Mr. Barry Royals, Chief
Surface Water Division
Office of Pollution Control
Mississippi Department of Environmental Quality
P. O. Box 10385
Jackson, MS 39289-0385

RECEIVED
MAR - 6 1997
Dept. of Environmental Quality
Office of Pollution Control

RE: Hercules, Incorporated NPDES/Industrial Wastewater Discharge

Dear Barry:

When we concluded our meeting on February 12, 1997, Hercules agreed to provide your Division with a status report within two weeks.

Although we could not make connection by telephone on February 26, 1997, I was able to leave a voice mail status report for both you and Jerry Cain. As indicated in our earlier status report, Hercules has scheduled a meeting with the City of Hattiesburg on Tuesday, March 18, 1997, to discuss options which may exist relating to the City of Hattiesburg publicly owned treatment works. Gerald Burch and Charlie Jordan of Hercules will be present for that meeting.

We will provide you with a report immediately following the March 18, 1997, meeting. Since Hercules is in the process of analyzing other aspects of its NPDES discharge, it will be most helpful if we can obtain copies of the EPA water quality study and copies of the analytical results of sampling, both of which were discussed at our February 12, 1997, meeting.

It will be most helpful if either you or Jerry Cain could give me a call to let me know if copies of the reports will be made available to us. As indicated above,

Mr. Barry Royals, Chief
March 5, 1997
Page 2

Hercules will provide you with a report soon after the March 18, 1997, conference with the City of Hattiesburg.

Very truly yours,

BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC



John A. Crawford

JAC/an
211S/Royals3.ltr

cc: Mr. Charlie Jordan



FILE COPY

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

March 3, 1997

Charles Jordan, Environmental Manager
Hercules Incorporated
613 West 7th Street
P. O. Box 10385
Hattiesburg, Mississippi 39209

Dear Mr. Jordan :

Re: EPA Water Quality Study
Bowie River

Enclosed is a study performed by E.P.A. on the back waters of the Bowie River. If you have any questions, please do not hesitate to contact me at 961-5171.

Sincerely ,

A handwritten signature in cursive script that reads "Charles Cook".

Charles Cook, P.E.
Industrial NPDES Section

CEC:dht
Enclosure



RECEIVED
FEB 21 1997
Dept. of Environmental Quality
Office of Pollution Control

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

February 19, 1997

Certified Mail - Return Receipt Requested *Forrest*
Z 079 760 419

Becky L. Ornelas
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Becky:

Following your 2/18/97 visit, please find the additional information.

Attached is an 11/20/1996 certified letter addressing the Phenol analysis in question. Also attached is a corrected DMR to reflect this. Please excuse any inconvenience this may have caused.

If I can answer any additional questions, call me at 601-545-3450, Ext. 360.

Very truly yours,

Charles Jordan
Environmental Supervisor

CJ:nb



CHEMICAL SPECIALTIES

February 17, 1997

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

Certified Mail - Return Receipt Requested
Z 079760358

Robert C. Arledge, Esq.
Schwartz & Associate, P.A.
P. O. Box 3949
Jackson, MS 39207

Re: Mrs. Willie M. Ashford

Dear Mr. Arledge:

I am writing in response to your letter of December 10, 1996.

I would like to provide you with additional information regarding the history of Hercules' attempts to identify and help resolve Mrs. Ashford's concerns. I have personally visited her house several times, as have other Hercules plant employees, in an attempt to address her concerns. We are very sympathetic to Mrs. Ashford's situation and are sorry that we cannot provide easy solutions. We have no information that would lead us to believe that any unpleasant odor that she may have smelled coming from Hercules could have been caused by any substance that can endanger her health.

Our first involvement with Mrs. Ashford was on September 9, 1996, when she left a message on the answering machine of Mr. Robert Jones, who is an employee at the Hattiesburg plant. Mr. Jones met with Mrs. Ashford on Tuesday, September 10, to hear her concerns first hand. At the time he was at her home, no odor could be detected by either Mr. Jones or Mrs. Ashford. When Mrs. Ashford contacted Mr. Jones again on the evening of September 11, again complaining of an odor, Mr. Jones, Mr. Charles Jordan, and I visited Mrs. Ashford that evening.

Based on the times Mrs. Ashford said that she smelled an odor, the likely cause was the routine aeration of our wastewater tank. If so, such odors, while unpleasant, would not contain harmful levels of any harmful chemicals based on our knowledge of plant operations. Because of her concern, previously scheduled maintenance of the tank was accelerated. This tank was emptied and taken out of service on September 12. We returned to Mrs. Ashford's house and told her about these actions on September 15. Repairs have since been completed and the tank returned to service on February 12, 1997.

Robert C. Arledge, Esq.
Schwartz & Associate, P.A.
February 17, 1997
Page 2

I received no other contact from Mrs. Ashford until October 30, 1996. On October 30, she said that the lingering smell from the September event was so bad she could not stay in her home. When Mr. Jones and I arrived, we could not smell what she was complaining about. She stated that the lingering smell had been so bad she had not been living in the house since October 17. She asked us to pay to have her house cleaned and to purchase an air purifying machine. I indicated that because I could not identify anything from Hercules that was causing an odor she continued to smell, I was not in a position to authorize these expenditures on her behalf.

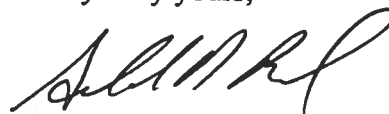
On November 5, 1996, I confirmed this to her in writing. I attach a copy of this letter for your information. There have been no complaints from Mrs. Ashford since my last letter.

It is certainly the desire of Hercules to be a good neighbor to the citizens of this area. Hercules has strived to do so for the many years it has operated in the Hattiesburg area. Hercules plans to continue this policy.

We certainly ask for any additional information you or your client may have, and we are willing to discuss this matter with you, your client, or both of you. We are prepared to have our corporate Medical Director, Dr. Thomas F. Weir, correspond with Mrs. Ashford's physician if an offending material or chemical can be identified and correlated to your client's complaints and symptoms.

Please give this matter further consideration and let us hear from you.

Very truly yours,



Gerald D. Burch
Plant Manager

GDB/vrf

Attachment: Letter of November 5, 1996

cc: Dorrance Aultman, Esq. - Aultman, Tyner, McNeese, Ruffin & Laird, Ltd.

bcc: Ronald Tarlton, Plant Manager, Zeon Chemicals Mississippi Inc.
✓ Charles S. Jordan, Environmental Coordinator, Hercules Incorporated
Robert E. Jones, Employee Relations Manager, Hercules Incorporated



Forrest
Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

February 14, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
Z 079 760 418

RECEIVED
FEB 18 1997
Dept. of Environmental Quality
Office of Pollution Control

Mr. Charles Cook
Bureau of Pollution Control
P. O. Box 10385
Jackson, MS 39209

Dear Mr. Cook:

Following our previous phone conversation, please find the following information for NPDES compliance monitoring in January 1997.

On 1/14/97 we experienced a Phenol excursion which we are again unresolved as to the cause of this excursion. Please reference our previous 11/20/96 letter. We did not produce any phenolic resin in January 1997. As previously stated, we believe our effluent turbidity does interfere with the analysis. This is supported by high solids on the date in question. The high solids were the result of our maintenance work/cleaning of our equalization tank which was put back in service the second week in February.

	<u>TSS (lbs/day)</u>		<u>Phenol (lbs/day)</u>	
<u>Date</u>	<u>Actual</u>	<u>Limit</u>	<u>Actual</u>	<u>Limit</u>
1/14/97	1,752	1,648	8.4	4.9

If I can answer any questions, please call me at 601-545-3450, Ext. 360.

Sincerely,



Charles Jordan
Environmental Supervisor

CJ/nb

cc: G. D. Burch



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

February 14, 1997

RECEIVED
FEB 20 1997
Dept. of Environmental Quality
Office of Pollution Control

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z 079 760 411

Forrest

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for January 1997.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Charles Jordan".

Charles Jordan
Environmental Coordinator

CSJ/nb

Attachment



STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

February 4, 1997

Mr. Gerald Burch
Plant Manager
Hercules, Inc.
P.O. Box 1937
Hattiesburg, MS 39401-1937

FILE COPY

Dear Mr. Burch:

Re: Hercules, Inc.
Forrest County-Hattiesburg
Compliance Inspection Report
NPDES Permit No. MS0001830

Enclosed is a copy of the NPDES Compliance Monitoring Inspection Report and sampling that was performed at Hercules, Inc. on October 22, 1996. The results of this inspection should be used by you as a guide for complying with requirements and limitations as stated by your NPDES permit. The sampling results indicate that the effluent was in compliance with your NPDES permit limits.

If you have any questions concerning this matter, please contact me at 961-5171.

Respectfully,

A handwritten signature in cursive script that reads "Becky Ornelas".

Becky Ornelas
Industrial NPDES Section

Enclosures

cc: Mr. Arthur Collins, EPA (w/ enclosures)
CRO
Mr. Paul Zetterholm (w/ enclosures)



Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

January 29, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z 079 760 410

Mr. Charles Cook
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

Forest

RECEIVED
FEB - 3 1997
Dept. of Environmental Quality
Office of Pollution Control


Dear Mr. Cook:

Following our 1/28/97 phone conversation, the purpose of this letter is to document the following rainfall events.

On 1/8/97 and 1/27/97 we experienced approximately 2 inches of rainfall. As a result of this excessive amount of rainfall over a short time period, coupled with the cleaning of our equalization tank, we estimate the following amount of primary wastewater bypassing secondary treatment in order to prevent basin overflow. Also on 1/27/97 because of equipment malfunction, pump failure, we overflowed our No. 5 Lift Station for approximately 30 minutes.

<u>ITEM</u>	<u>MGD</u>	<u>TOC</u>		<u>Permit limit</u>
		<u>mg/l</u>	<u>lbs/day</u>	
1/8/97 (1,080 gpm x 100 minutes)				
Bypass	0.11	101		
Outfall 001	1.29	196		
Total	1.40			3,800
1/27/97 (1,080 ppm x 80 minutes)				
Bypass	0.09	180	135	
Outfall 001	1.23	120	1,231	
Total	1.32		1,366	3,800

If I can answer any additional questions, please call me at 601-545-3450, Ext. 360.

Very truly yours,

Charles Jordan
Environmental Coordinator

CC: G. D. Burch, Plant Manager

**BUTLER, SNOW,
O'MARA, STEVENS
& CANNADA, PLLC**

ATTORNEYS AT LAW

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POST OFFICE BOX 22567
JACKSON, MISSISSIPPI 39225-2567
(601) 948-5711
FACSIMILE: (601) 949-4555

Hercules Chem. Co. Forest Co.

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DONNA BROWN JACOBS
SELBY A. IRELAND
WILLIAM M. GAGE

FILE COPY

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DAN McCULLEN
OF COUNSEL
GEO. BUTLER (1948)
J. MORGAN STEVENS (1951)
CLAS B. SNOW (1960)
JUNIOR O'MARA (1986)

January 24, 1997

Writer's Direct Number
(601) 949-4534

Mr. Charles Cook, P.E.
Industrial NPDES Section
Mississippi Department of Environmental Quality
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385



RE: Hercules Incorporated NPDES Permit MS0001830

Dear Mr. Cook:

Hercules Incorporated has received your letter of January 9, 1997 in which you enclose a draft NPDES permit with the request that informal comments be made on or before January 31, 1997.

This letter confirms that we contacted Jerry Cain on related matters and asked for an extension of time until February 14, 1997, within which to make informal comments. Mr. Cain has authorized this extension.

We will appreciate your making a notation in your file with reference to the new due date for informal comments.

Very truly yours,

BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC


John A. Crawford

JAC/an
211S/Cook.ltr

cc: Mr. Jerry Cain
Mr. Charles Jordan

**BUTLER, SNOW,
O'MARA, STEVENS
& CANNADA, PLLC**

ATTORNEYS AT LAW

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DAN McCLURE
OF COUNSEL
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J. MORGAN STEVENS (1951)
CEAS. B. SNOW (1960)
L. N. O'MARA (1986)

January 24, 1997

Writer's Direct Number
(601) 949-453

Mr. Charles Cook, P.E.
Industrial NPDES Section
Mississippi Department of Environmental Quality
Office of Pollution Control
P. O. Box 10385
Jackson, MS 39289-0385

RECEIVED
JAN 27 1997
Mississippi Department of Environmental Quality
Office of Pollution Control

RE: Hercules Incorporated NPDES Permit MS0001830

Dear Mr. Cook:

Hercules Incorporated has received your letter of January 9, 1997 in which you enclose a draft NPDES permit with the request that informal comments be made on or before January 31, 1997.

This letter confirms that we contacted Jerry Cain on related matters and asked for an extension of time until February 14, 1997, within which to make informal comments. Mr. Cain has authorized this extension.

We will appreciate your making a notation in your file with reference to the new due date for informal comments.

Very truly yours,

BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC


John A. Crawford

JAC/an
211S/Cook.ltr

cc: ✓ Mr. Jerry Cain
Mr. Charles Jordan

 **HERCULES**

RECEIVED
JAN 24 1997
Dept. of Environmental Quality
Office of Pollution Control

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39403-1937
(601) 545-3450
Fax: (601) 584-3226

January 21, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

No. Z 079 760 406


Mr. Charles Cook
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289-0385

Forest

Dear Mr. Cook:

Attached is our EPA Discharge Monitoring Report for December 1996.

Very truly yours,


Charles Jordan
Environmental Coordinator

CSJ/nb

Attachment



*file:
Forrest Co,*

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

January 9, 1997

Mr. Charles Jordan, Environmental Coordinator
Hercules Incorporated
613 West 7th Street
P.O. Box 10385
Hattiesburg, Ms. 39209

Dear Mr. Jordan:

Re: NPDES Permit MS0001830

The Mississippi Pollution Control Permit Board intends to soon issue to the above facility a National Pollutant Discharge Elimination System (NPDES) Permit. The enclosed draft permit and public notice are submitted to you for your review and comment.

It is important that you read and understand the conditions of this permit. Only that waste water which is described in your application and which is included in your permit is legally authorized for surface discharge.

Any comments you may have concerning this draft permit and public notice should be submitted no later than January 31, 1997; otherwise, we will presume you have none and proceed with the permitting process.

Sincerely,

Charles Cook

Charles Cook, P.E.
Industrial NPDES Section

cc: Nona Yates, OPC
Enclosures

DATE: Aug 15/1997

State of Mississippi Water Pollution Control PERMIT

TO DISCHARGE WASTEWATER IN ACCORDANCE WITH THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

THIS CERTIFIES THAT

HERCULES INCORPORATED
HATTIESBURG, MISSISSIPPI

has been granted permission to discharge wastewater into

001 - unnamed tributary of the Bowie River

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof. This permit is issued in accordance with the provisions of the Mississippi Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No. MS0001830

Expires: September 16, 2002

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- During the period beginning on permit issuance, and lasting until September 16, 2000, the permittee is authorized to discharge from outfall(s) serial number(s) 001 (Process Wastewater and Storm Water).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS		
	kg/day (lbs/day)	Other Units	(Specify)	Measurement	Sample	
	Monthly Avg.	Daily Max.	Monthly Avg.	Frequency	Type	
Flow-M ³ /day (MGD)	--	--	Report	Continuous	Recorder	
Biochemical Oxygen Demand (5-Day)	565 (1244)	1055 (2322)	Report	3 Days/Week	24-Hr. Composite	
Total Suspended Solids	255 (561)	708 (1557)	Report	3 Days/Week	24-Hr. Composite	
Total Organic Carbon	915 (2013)	1372 (3019)	Report	1/Month	24-Hr. Composite	
Oil and Grease	300 (660)	450 (990)	Report	3 Days/Week	Grab	
Phenol	1.5 (3.3)	3 (6.6)	Report	3 Days/Week	Grab	

- There shall be no discharge of floating solids or visible foam in other than trace amounts.
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on permit issuance, and lasting until September 16, 2000, the permittee is authorized to discharge from outfall(s) serial number(s) 002 (Storm Water, Noncontact Cooling Water, and Outfall 001).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER

DISCHARGE LIMITATIONS

MONITORING REQUIREMENTS

	kg/day (lbs/day)		Other Units		Measurement Frequency	Sample Type
	Monthly Avg.	Daily Max.	Monthly Avg.	Daily Max.		
Flow-M ³ /day (MGD)	--	--	Report	Report	Continuous	Recorder
Temperature °C (°F)	--	--	--	41 (105)	3 Days/Week	Grab
2. The pH shall not be less than 6.5 standard units nor greater than 9.0 standard units and shall be monitored continuously with a grab sample of the effluent.						
3. There shall be no discharge of floating solids or visible foam in other than trace amounts.						
4. The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.						
5. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.						
6. The LC ₅₀ shall pass at less than or equal to 10.7% of the effluent.						

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- During the period beginning September 17, 2000, and lasting until September 16, 2002, the permittee is authorized to discharge from outfall(s) serial number(s) 001 (Process Wastewater).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER	DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS			
	kg/day (lbs/day)		Other Units (Specify)		Measurement Frequency	Sample Type		
	Monthly Avg.	Daily Max.	Monthly Avg.	Daily Max.				
Flow-M ³ /day (MGD)	--	--	Report	Report	Continuous	Recorder		
Biochemical Oxygen Demand (5-Day)	79.54 (175.2)	53 (117)	10 mg/l	15 mg/l	3 Days/Week	24-Hr. Composite		
Total Suspended Solids	159 (350)	240 (525)	Report	Report	3 Days/Week	24-Hr. Composite		
Ammonia Nitrogen (as N)	7.1 (15.6)	10.6 (23.4)	2 mg/l	3 mg/l	3 Days/Week	24-Hr. Composite		
Total Organic Carbon	103.5 (228)	69.1 (152.1)	Report	Report	1/Month	24-Hr. Composite		
Oil and Grease	79.5 (175)	53.1 (117)	Report	Report	3 Days/Week	Grab		
Phenol	.54 (1.19)	1.6 (3.5)	0.102 mg/l	0.3 mg/l	3 Days/Week	Grab		

- There shall be no discharge of floating solids or visible foam in other than trace amounts.

- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.

- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.

- Dissolved Oxygen shall not be below 6 ppm and shall be monitored three days per week.

- These limits shall be complied within three (3) years after permit issuance.

- Aluminum, Boron, Nickel, Selenium, Zinc shall be sampled twice per month for six months. Based on the results, the toxicity matrix will be reevaluated and the permit shall be modified accordingly.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- During the period beginning **September 17, 2000**, and lasting until **September 16, 2002**, the permittee is authorized to discharge from outfall(s) serial number(s) **002 (Storm Water, Noncontact Cooling Water and Outfall 001)**.

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER

DISCHARGE LIMITATIONS

MONITORING REQUIREMENTS

	kg/day (lbs/day)		Other Units (Specify)		Measurement Frequency	Sample Type
	Monthly Avg.	Daily Max.	Monthly Avg.	Daily Max.		
Flow-M ³ /day (MGD)	--	--	Report	Report	Continuous	Recorder
Temperature °C (°F)	--	--	Report	32 (90)	3 Days/Week	Instantaneous

- The pH shall not be less than **6.5** standard units nor greater than **9.0** standard units and shall be monitored continuously with a **grab sample of the effluent**.
- There shall be no discharge of floating solids or visible foam in other than trace amounts.
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): **the nearest accessible point after final treatment but prior to mixing with the receiving streams**.
- The **I₂₅** shall pass at less than or equal to **100%** of the effluent.

B. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the effluent limitations specified for discharge in accordance with the following schedule:

Upon permit issuance.

2. Within 14 days after either an interim or final date of compliance specified in Part I.B.1., the permittee shall provide the Permit Board with written notice of his compliance or noncompliance with the requirements or conditions specified to be completed by that date.

Not applicable.

C. DEFINITIONS

1. "Monthly average" means the average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during the month. The monthly average for fecal coliform bacteria is the geometric mean of "daily discharges" measured during the calendar month. In computing the geometric mean for fecal coliform bacteria, the value one (1) shall be substituted for sample results of zero.
2. "Daily discharge" means the "discharge of a pollutant" measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurements, the "daily average" is calculated as the average measurement of the discharge of the pollutant over the day.
3. "Daily maximum" means the highest "daily discharge" over a calendar month.

4. "Toxic pollutants" include, but are not limited to: (a) any toxic substance listed in Section 307(a)(1) of the Clean Water Act (CWA), any chemical listed in Section 313(c) of the Superfund Amendments and Reauthorization Act of 1986; and (b) any substance (that is not also a conventional or nonconventional pollutant) for which EPA or the State has published an acute or chronic toxicity criterion.
5. "Hazardous substances" are defined in 40 CFR 116.4.

D. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater.

2. Reporting

- a. Monitoring results obtained during the previous month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1) **POSTMARKED NO LATER THAN THE 28TH DAY OF THE MONTH FOLLOWING THE COMPLETED REPORTING PERIOD. THE FIRST REPORT IS DUE ON NOVEMBER 28, 1997.** Copies of these, and all other reports required herein, shall be signed in accordance with Chapter One Sections II.C. and II.E. of the Mississippi Wastewater Permit Regulations, and shall be submitted to the Mississippi Environmental Quality Permit Board at the following address.

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385**

- b. If the results for a given sample analysis are such that any parameter (other than fecal coliform) is not detected at or above the minimum level for the test method used, a value of zero will be used for that sample in calculating an arithmetic mean value for the parameter. If the resulting calculated arithmetic mean value for that reporting period is zero, the permittee shall report "NODI = B" on the DMR. For fecal coliform, a value of 1.0 shall be used in calculating the geometric mean. If the resulting fecal coliform mean value is 1.0, the permittee shall report "NODI = B" on the DMR. For each quantitative sample value that is not detectable, the test method used and the minimum level for that method for that parameter shall be attached to and submitted with the DMR. The permittee shall then be considered in compliance with the appropriate effluent limitation and/or reporting requirement.
- c. If the permittee monitors any pollutant as prescribed in the permit more frequently than required by the permit using test procedures approved under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503, or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Permit Board.
- d. Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Permit Board in the permit.

3. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(h) of the Federal Water Pollution Control Act, as amended or alternative procedures approved and/or promulgated by EPA. For those parameters listed in Exhibit D of the Mississippi Wastewater Permit Regulations, the permittee shall use approved methods with minimum quantification levels as sensitive as those found in Exhibit D of the regulations.

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain records of all information obtained from such monitoring including:

- (a) The exact place, date, and time of sampling;
- (b) The dates the analyses were performed;
- (c) The person(s) who performed the analyses;
- (d) The analytical techniques, procedures or methods used; and
- (e) The results of all required analyses.

5. Records Retention

All records and results of monitoring activities required by this permit, including calibration and maintenance records, shall be retained by the permittee for a minimum of three (3) years, unless otherwise required or extended by the Permit Board, copies of which shall be furnished to the Department upon request.

6. Falsifying Reports

Any permittee who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required by the Permit Board to be maintained as a condition in a permit, or who alters or falsifies the results obtained by such devices or methods and/or any written report required by or in response to a permit condition, shall be deemed to have violated a permit condition and shall be subject to the penalties provided for a violation of a permit condition pursuant to Section 49-17-43 of the Code.

PART II

A. MANAGEMENT REQUIREMENTS

1. Facility Expansion and/or Modification

Any facility expansion, production increases, process modifications, changes in discharge volume or location or other changes in operations or conditions of the permittee which may result in a new or increased discharge of waste, shall be reported to the Permit Board by submission of a new application for a permit pursuant to Section II.A. of the Mississippi Wastewater Regulations, or if the discharges does not violate effluent limitations specified in the permit, by submitting to the Permit Board a notice of a new or increased discharge.

2. Duty to Comply 40 CFR 122.41(a)

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

3. Noncompliance Notification

a. Twenty-Four Hour Reporting

- (1) The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and/or prevent recurrence of the noncompliance.
- (2) The following shall be included as information which must be reported within 24 hours under this paragraph.
 - i. Any unanticipated bypass which exceeds any effluent limitation in the permit.
 - ii. Any upset which exceeds any effluent limitation in the permit.
 - iii. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Permit Board in the permit to be reported within 24 hours.

- (3) The Executive Director may waive the written report on a case-by-case basis for reports under paragraph a. of this section if the oral report has been received within 24 hours.

b. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under paragraph a., at the time monitoring reports are submitted or within 30 days from the end of the month in which the noncompliance occurs. The reports shall contain the information listed in paragraph a.

c. Other Information

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Permit Board, it shall promptly submit such facts or information.

4. Proper Operation, Maintenance and Replacement

The permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. Proper replacement includes maintaining an adequate inventory of replacement equipment and parts for prompt replacement when necessary to maintain continuous collection and treatment of wastewater. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

5. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment.

6. Bypassing

The permittee shall comply with the terms and conditions regarding bypass found in 40 CFR 122.41(m).

7. Upsets

Permittee shall meet the conditions of 40 CFR 122.41(n) regarding "Upsets" and as follows:

- a. Definition. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- b. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph (c) of this section are met. Any determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, shall not constitute final administrative action subject to judicial review.
- c. Conditions necessary for demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and that the permittee can identify the cause(s) of the upset;
 - (2) The permitted facility was at the time being properly operated; and
 - (3) The permittee submitted notice of the upset as required in 40 CFR 122.41(L)(6)(ii)(B) (24-hour notice of noncompliance).
 - (4) The permittee complied with any remedial measures required under 40 CFR 122.41(d) (Duty to Mitigate).
- d. Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

8. Removed Substances

Solids, sludges, filter backwash, or other residuals removed in the course of treatment or control of wastewater shall be disposed of in a manner such as to prevent such materials from entering State waters and in a manner consistent with the Mississippi Solid Waste Disposal Act, the Federal Resource Conservation and Recovery Act, and the Mississippi Water Pollution Control Act.

9. Power Failures

If electric power is required, in order to maintain compliance with the conditions and prohibitions of the permit, the permittee shall either:

- a. Provide an alternative power source to operate the wastewater control facilities; or, if such alternative power source is not in existence, and no date for its implementation appears in the permit,
- b. Halt, reduce, or otherwise control production and/or all wastewater flows upon reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

1. Inspection and Entry

The permittee shall allow any authorized Commission representative to enter the permittee's premises at any reasonable time, to have access to and copy any applicable records, to inspect process facilities, treatment works, monitoring methods or equipment or to take samples, as authorized by Section 49-17-29 of the Code. In the event of investigation during an emergency response action, a reasonable time shall be any time of the day or night. Follow-up investigations subsequent to the conclusion of the emergency event shall be conducted at reasonable times.

2. Transfer of Ownership or Control

This permit is not transferable to any person except after proper notice and approval by the Permit Board. In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the Mississippi Environmental Quality Permit Board at least thirty (30) days in advance of the proposed transfer date. The notice should include a written agreement between the existing and new permittees containing a specific date for the transfer of permit responsibility, coverage, and liability.

3. Signatory Requirements 40 CFR 122.41(k)

All applications, reports, or information submitted to the Permit Board shall be signed and certified.

a. All permit applications shall be signed as follows:

- (1) For a corporation: by a responsible corporate officer. For the purpose of this Section, a responsible corporate officer means: (1) a president, secretary, treasurer or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy - or decision-making function for the corporation, or (2) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding 25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
- (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.

b. All reports required by the permit and other information requested by the Permit Board shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- (1) The authorization is made in writing by a person described above;
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and
- (3) The written authorization is submitted to the Permit Board.

- c. Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Permit Board prior to or together with any reports, information, or applications.
- d. Certification. Any person signing a document under paragraphs (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

4. Availability of Records

Except for data determined to be confidential under the Mississippi Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the office of the Mississippi Department of Environmental Quality Office of Pollution Control.

5. Duty to Provide Information

- a. The permittee shall furnish to the Permit Board within a reasonable time any relevant information which the Permit Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

6. Toxic Pollutants

The permittee shall comply with any toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) established under Section 307(a) of the Federal Water Pollution Control Act.

7. Toxic Pollutants Notification Requirements

The permittee shall comply with the applicable provisions of 40 CFR 122.42.

8. Civil and Criminal Liability

- a. Any person who violates a term, condition or schedule of compliance contained within this permit or the Mississippi Water Pollution Control Law is subject to the actions defined by law.
- b. Except as provided in permit conditions on "Bypassing" and "Upsets" (Part II, A-6 and 7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.
- c. It shall not be the defense of the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

9. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under Section 311 of the Federal Water Pollution Control Act and applicable provisions under Mississippi Law pertaining to transportation, storage, treatment, or spillage of oil or hazardous substances.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

11. Severability

The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

12. Expiration of Permit

At least 180 days prior to the expiration date of this permit pursuant to the State law and regulation, the permittee who wishes to continue to operate under this permit shall submit an application to the Permit Board for reissuance. The Permit Board may grant permission to submit an application later than this, but no later than the expiration date of the permit.

13. Protection of Confidential Information

- a. Pursuant to Miss. Code Ann. § 49-17-39 and 40 CFR 123.41, the Permit Board shall make available to the public all information contained on any form and all public comments on such information. Effluent data and information concerning air or water quality shall also be made available to the public. Information that is determined by the Commission to be trade secrets shall not be disclosed to the public without prior consent of the source of such information. When a claim of confidentiality is made by a person in accordance with the provisions of Miss. Code Ann. § 49-17-39, a recommendation on the questions of confidentiality shall be made by the Commission and forwarded to the Regional Administrator (or his/her designee) of EPA for his concurrence in such determination of confidentiality.
- b. A copy of a State, UIC, or NPDES permit application, public notice, fact sheet, draft permit and other forms relating thereto, including written public comment and other reports, files and information relating to the application not classified as confidential information by the Commission pursuant to Part II.B.13.a., shall be available for public inspection and copying during normal business hours at the office of the Department in Jackson, Mississippi.
- c. Upon determination by the Commission that information submitted by a permit applicant is entitled to protection against disclosure as trade secrets, the information shall be so labeled and otherwise handled as confidential. Copies of the information and a notice of the Commission's action shall be forwarded to the Regional Administrator (or his/her designee). In making its determination of entitlement to protection as a trade secret, the Commission shall follow the procedure set forth in Miss. Code Ann. § 49-17-39. In the event the Commission denies the claim of confidentiality, the applicant shall have, upon notification thereof, the right to appeal the Commission's determination in the same manner provided for other orders of the Commission. No disclosure, except to EPA, shall be allowed until any appeal from the determination of the Commission is completed.

14. Spill Prevention and Best Management Plans

Any permittee which has above ground bulk storage capacity, of more than 1320 gallons or any single container with a capacity greater than 660 gallons, of materials and/or liquids (including but not limited to, all raw, finished and/or waste material) with chronic or acute potential for pollution impact on waters of the State and not subject to Mississippi Hazardous Waste Management Regulations or 40 CFR 112 (Oil Pollution Prevention) regulations shall provide secondary containment as found in 40 CFR 112 or equivalent protective measures such as trenches or waterways which would conduct any tank releases to a permitted treatment system or sufficient equalization or treatment capacity needed to prevent chronic/acute pollution impact.

PART III

A. REOPENER CLAUSE

This permit shall be modified, or alternately, revoked and reissued, to comply with any applicable effluent standard, limitation or storm water regulation issued or approved under Section 301(b)(2)(C), and (D), 304(b)(2), 307(a)(2) and 402(p) of the Federal Water Pollution Control Act if the effluent standard, limitation or regulation so issued or approved:

1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
2. Controls any pollutant not limited in the permit.

B. CLOSURE REQUIREMENTS

Should the permittee decide to permanently close and abandon the premises upon which it operates, it shall so notify the Permit Board no later than 90 days prior to doing so. This Closure Plan shall address how and when all manufactured products, by-products, raw materials, stored chemicals, and solid and liquid waste and residues will be removed from the premises so that no potential environmental hazard to the waters of the State will be presented.

C. REQUIREMENTS REGARDING COOLING AND BOILER WATER ADDITIVES

Notification shall be made to the permitting authority in writing not later than sixty (60) days prior to initiating the addition of any chemical product to the cooling water and/or boiler water which is subject to discharge, other than those previously approved and/or used. Such notification should include, but not be limited to:

1. Name and composition of the proposed additive,
2. Proposed discharge concentration,
3. Dosage addition rates,
4. Frequency of use,
5. EPA registration, if applicable, and
6. Aquatic species toxicological data.

Written approval must be received from the permitting authority prior to initiating use.

D. OTHER STANDARD CONDITIONS

A Storm Water Pollution Study shall be submitted six months after permit issuance. The Study shall contain the following elements. The rainfall events that cause a bypass of the treatment system shall be identified. Both the intensity and duration of the events shall be listed. The capacity of the system shall be compared to the water generated by a 10-year worst case 24-hour storm. A process storm water minimization plan shall be developed to assess options on diverting flow from plant areas no longer involved in production. In addition, process areas shall be investigated to determine whether berming specific process areas to minimize flow is feasible. A compliance schedule that outlines the steps the facility will take to comply with the upcoming new permit limits shall be submitted within one year of permit issuance. Acute biomonitoring shall be performed for the first three years of the permit (refer to page 20). Chronic biomonitoring shall be conducted for the last two years of permit issuance (refer to page 22).

E. ACUTE BIOASSAY REQUIREMENTS

The Water Quality Standards of Mississippi require that all waters be free from substances in concentrations or combinations which are harmful to humans, animals, or aquatic life (State of Mississippi, Water Quality Criteria for Intrastate, Interstate and Coastal Waters, page 3, adopted November 16, 1995). In accordance with such requirements, the permittee is authorized to discharge from outfall 002 only in accordance with the following conditions:

1. The permittee shall submit any existing toxicity data for review by the Mississippi Office of Pollution Control within 30 days of the effective date of this permit.
2. The permittee shall perform static renewal (tests that exceed 48 hours shall be renewed), definitive (a control and five effluent concentrations) toxicity tests at 25°C in accordance with Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or the most recent edition. Acute toxicity tests will be conducted on 24-hour composite samples of effluent, and tests must be initiated within 36-hours of completion of the sampling period.
 - a. If the Mississippi Office of Pollution Control determines the receiving stream is freshwater, the permittee must use both the following test organisms and test durations:
 - (1) Pimephales promelas (< 24-hrs.of age) - 96 hour
 - (2) Ceriodaphnia dubia - 48 hour
 - b. If the Mississippi Office of Pollution Control determines the receiving stream is marine or estuarine, the permittee must use both the following test organisms and test durations:

- (1) Menidia beryllina - 96 hour
- (2) Mysidopsis bahia - 48 hour

c. Dilution water used for these tests shall consist of reagent grade water, defined as distilled or deionized water that does not contain substances which are toxic to the test organisms. For freshwater tests, dilution water shall consist of reagent grade chemicals or mineral water combined to make moderately hard dilution water according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition'. For estuarine testing, dilution water shall consist of synthetic seawater or hypersaline brine combined to achieve a salinity of 20 parts per thousand according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition'. These dilution waters will be deemed acceptable if the survival of the control organisms in the toxicity tests is 90% or greater.

d. A standard reference toxicant quality assurance test (acute) shall be conducted concurrently with the effluent tests using both species used in the toxicity tests. Alternatively, if a lab conducts monthly QA/QC reference toxicant tests for both species as part of their SOP, these results may be submitted in lieu of the above mentioned concurrent tests. In either case the reference toxicant test results must be submitted in the final report as well as on the Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.

3. The permittee shall conduct the first series of tests specified in Section 2 above within 90 days of the issuance of the permit. The tests shall be conducted quarterly thereafter for twelve (12) consecutive months, provided that the acute LC_{50} is greater than or equal to 10.7%. After the first year of testing, the frequency of monitoring will be reduced to once per six months for the life of the permit. Sampling shall be timed to cover the seasonal extremes of the year (hot-dry and cold-wet). The results of these acute toxicity tests shall be reported to the Mississippi Environmental Quality Permit Board on the next quarterly discharge monitoring report. Final acute toxicity test results shall be in report form as outlined in Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition'. Along with this report, the permittee must submit a completed Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form within two weeks following test completion.
4. If either toxicity test results in an LC_{50} value of less than 10.7%, the permittee shall initiate a second toxicity test within 2 weeks after the completion of the first toxicity test using the organism(s) that failed. The LC_{50} determinations from these tests shall be reported to the Mississippi Environmental Quality Permit Board within two weeks after completion the test.

5. In the event that the results of any toxicity test reveals that the LC_{50} of the permittee's effluent is less than 10.7%, then this finding will constitute a violation of Part I of this permit. In the event the permittee passes the second toxicity test, the permittee shall resume testing in accordance with the testing schedule set forth in the permit. In the event the permittee fails the second WET test, the permittee shall submit a Toxicity Reduction Evaluation Plan (TREP) within 45 days following completion of the follow-up tests to reduce the toxicity of the effluent to safe levels.¹ The first phase of the TREP shall include monitoring to characterize the toxicity of the effluent.

In addition to the specific conditions of this permit, the permittee shall comply with all applicable conditions of 40 CFR 122.7 and 40 CFR 122.61 (06-03-93).

¹Safe levels will be determined by the Mississippi Pollution Control Permit Board.

*Contact the Mississippi Office of Pollution Control Laboratory for information on most recent edition(s) of methods manual.

F. CHRONIC BIOASSAY REQUIREMENTS

The Water Quality Standards of Mississippi require that all waters be free from substances in concentrations or combinations which are harmful to humans, animals, or aquatic life (State of Mississippi, Water Quality Criteria for Intrastate and Coastal Waters, Section II.4., Minimum Conditions Applicable to All Waters, page 3, adopted November 16, 1995). In accordance with such requirements, the permittee is authorized to discharge from outfall(s) 002 only in accordance with the following conditions:

1. The permittee shall submit any existing toxicity data for review by the Mississippi Office of Pollution Control within 30 days of the effective date of this permit.
2. The permittee shall perform 7-day chronic, static renewal, definitive (a control and five effluent concentrations) WET tests in accordance with Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, (EPA/600/4-89/001) or Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, (EPA/600/4-91/003) or the most recent edition.
 - a. Dilution water used for these tests shall consist of reagent grade water, defined as distilled or deionized water that does not contain substances which are toxic to the test organisms. For freshwater tests, dilution water shall consist of reagent grade chemicals or mineral water combined to make moderately hard dilution water according to Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms (EPA/600/4-89/001) or most recent edition. For estuarine testing, dilution water shall consist of synthetic seawater or

hypersaline brine combined to achieve a salinity of 20 parts per thousand according to Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms (EPA/600/4-91/003) or most recent edition'. These dilution waters will be deemed acceptable if the control organisms in the toxicity tests meet the minimum EPA criteria for chronic tests.

- b. If the Mississippi Office of Pollution Control determines the receiving waters are freshwater, the permittee shall conduct a *Ceriodaphnia dubia* Survival and Reproduction Test, and a *Pimephales promelas* Larval Survival and Growth Test on serial dilutions of effluent to determine if the discharge from outfall(s) 002 is chronically toxic. Such testing will determine if the water affects the survival, growth, and reproduction of the test organisms. Static renewal tests will be conducted on three 24-hour composite samples of effluent. The first of these composite samples will be used to set up the tests and for the day 1 and day 2 renewals, the second of these composite samples will be used to renew the tests on days 3 and 4, and the third composite sample will be used to renew the tests on days 5 and 6. Not more than 36 hours will elapse between sampling and the first use of any of the composite samples. The chronic test(s) shall be considered valid only if the acceptability criteria referenced in Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, (EPA/600/4-89/001), or the most recent edition', are met. All data shall be statistically analyzed according to the referenced manual.
- c. If the Mississippi Office of Pollution Control determines that the receiving water is estuarine, the permittee shall conduct a *Menidia beryllina* Larval Survival and Growth Test and a *Mysidopsis bahia* Survival, Growth, and Fecundity Test on serial dilutions of effluent to determine if the discharge from outfall(s) 002 is chronically toxic. Such testing will determine if the water affects the survival, growth, and fecundity of the test organisms. Static renewal tests will be conducted on three 24-hour composite samples of effluent. The first of these composite samples will be used to set up the tests and for the day 1 and day 2 renewals, the second of these composite samples will be used to renew the tests on days 3 and 4, and the third composite sample will be used to renew the tests on days 5 and 6. Not more than 36 hours will elapse between sampling and the first use of any of the composite samples. The chronic test(s) shall be considered valid only if the acceptability criteria referenced in Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, (EPA/600/4-87/028) or most recent edition' are met. All test data shall be statistically analyzed according to the referenced manual.
- d. A standard reference toxicant quality assurance test (chronic) shall be conducted concurrently with the effluent

tests using both species used in the toxicity tests. Alternatively, if a lab conducts monthly QA/QC reference toxicant tests with both species as part of their SOP, these results may be submitted in lieu of the above mentioned concurrent tests results. In either case, the reference toxicant test results must be submitted with the final report as well as on the Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.

3. These chronic toxicity tests shall be initiated within 90 days of the date of issuance of the permit to evaluate wastewater toxicity. Such chronic toxicity tests shall be conducted once per quarter for a period of one year following the effective date of the permit. After the first year of monitoring, provided the IC_{25} is greater than or equal to 100%, the frequency of monitoring will be reduced to once per six months for the life of the permit. Sampling shall be timed to cover the seasonal extremes of the year (hot-dry and cold-wet).
4. If any one chronic toxicity test indicates the IC_{25} is less than 100%, the provisions in Section 6 below shall apply, and the permittee shall conduct another chronic toxicity test(s) with the organism(s) that failed. This follow-up test must be completed within 30 days following completion of the failed test. Final chronic toxicity test results shall be in report form as outlined in Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition*. The permittee must also submit a completed Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.
5. In the event the permittee passes the additional WET test, the permittee shall resume testing in accordance with the testing schedule set forth in the permit. In the event the permittee fails the second WET test, the permittee shall submit a Toxicity Reduction Evaluation Plan (TREP) within 45 days following completion of the follow-up test in order to reduce the toxicity of the effluent to safe¹ levels². The first phase of the TREP will include increased monitoring to characterize the toxicity of the effluent.
6. If the IC_{25} of any test is less than 100%, then the effluent will be considered unacceptably chronically toxic, and this will constitute a violation of Part I of this permit.

¹Safe levels will be determined by the Mississippi Environmental Quality Permit Board.

²In large rivers, lakes, and estuaries the permittee must provide a schematic map showing isopleths of waste concentrations.

In addition to the specific conditions of this permit, the permittee shall comply with all applicable conditions of 40 CFR 122.7 and 40 CFR 122.61 (06-03-93).

*Contact the Mississippi Office of Pollution Control Laboratory for information on most recent edition(s) of methods manual.

PUBLIC NOTICE
Mississippi Environmental Quality Permit Board
P. O. Box 10385
Jackson, MS 39209
Telephone No. (601) 961-5171

August 15, 1997

Hercules Incorporated, located at 613 West 7th Street P.O.10385 Hattiesburg, Ms. 39209, has applied to the Mississippi Environmental Quality Permit Board for the reissuance of an NPDES Permit to discharge treated chemical process waste water and non-contact coolingwater from a waste water treatment system to a tributary of the Bowie River. The applicant's operation manufactures resins and paper chemicals. One discharge is described in the application.

The environmental impact of this project has been evaluated and the staff of the Permit Board believes that, with proper environmental constraints and limitations on the applicant, this project will operate within all State and Federal environmental laws and standards. Therefore, the staff of the Board has preliminarily decided, based on available information, to recommend to the Board that a permit be issued containing numerous environmental regulatory constraints specifically stated in the draft permit. However, before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Jerry Cain at the Permit Board's address shown above, no later than September 15, 1997. All comments received by that date will be considered in the formulation of final determinations regarding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit.

Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing or calling Charles Cook at the Permit Board's address and telephone number shown above. Also, this and other information is available for review and copying during normal business hours at the Southport Center Building located at 2380 Highway 80 West, Jackson, MS.

Please bring the foregoing to the attention of persons whom you know will be interested.

FILE COPY

PUBLIC NOTICE
Mississippi Environmental Quality Permit Board
P. O. Box 10385
Jackson, MS 39209
Telephone No. (601) 961-5171

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Please bring the foregoing to the attention of persons whom you know will be interested.

FOREST

PASTE PROOF HERE

PUBLIC NOTICE
Mississippi Environmental Quality
Permit Board
P.O.Box 10385
Jackson, MS 39209
Telephone No.(601)961-5171
June 1, 1997

Hercules Incorporated, located at 613 West 7th Street, P.O. Box 10385, Hattiesburg, MS, 39205, has applied to the Mississippi Environmental Quality Permit Board for the reissuance of an NPDES Permit to discharge treated chemical process waste water and non-contact cooling water from a wastewater treatment system to a tributary of the Bowie River. The applicant's operation manufactures resins and paper chemicals. One discharge is described in the application.

The environmental impact of this project has been evaluated and the staff of the Permit Board believes that, with proper environmental constraints and limitations on the applicant, this project will operate within all State and Federal environmental laws and standards. Therefore, the staff of the Board has preliminarily decided, based on available information, to recommend to the Board that a permit be issued containing numerous environmental regulatory constraints specifically stated in the draft permit. However, before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Jerry Cain at the Permit Board's address shown above, no later than June 30, 1997. All comments received by that date will be considered in the formulation of final determinations regarding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit.

Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing or calling Charles Cook at the Permit Board's address and telephone number shown above. Also, this and other information is available for review and copying during normal business hours at the Southport Center Building located at 2380 Highway 80 West, Jackson, MS.

Please bring the foregoing to the attention of persons whom you know will be interested.
June 1, 1997

T. STATE OF MISSISSIPPI,

JUN - 5 1997

FORREST COUNTY, Linda Stanford

Personally appeared before me JOHN W. BAKER
JOHN W. BAKER

a Notary Public of the City of Hattiesburg, Forre

County, Mississippi, Robert R. Cook
Clerk for HATTIESBURG AMERICAN, a
newspaper published in the City of Hattiesburg,
Forrest County, Mississippi who, being duly sworn,
says that the notice, a true copy of which is here
annexed, appeared in the issues of said newspaper
as follows:

Date June 1, 1997

Date _____, 19____

Date _____ .19

Date _____ .19

Date _____ .19____

Number Words 357

Published Times

Printer's Fee \$ 28.50

Making Proof \$ 100

Total \$ 29.32

(Signed) Corene K. Coates
Clerk

Sworn to and subscribed before me the 1st

day of June 1947

John Edward Brown.

Notary Public

44-38861-10000

CERTIFICATE OF AUTHORITY

Pursuant to the provisions of the State of Mississippi and the United States Environmental Protection Agency environmental regulations, I, Marshall Steinberg, being a principal executive officer of the Corporation of at least the level of Vice President, do hereby certify that I have this day authorized and directed, as my duly authorized representative, the person designated below (being the individual having responsibility for the overall operation of the regulated facility), to complete, sign and submit, in the name and on behalf of the Corporation, all environmental reports or requests for information required by Federal and/or State permit issuing authorities:

Authorized Representative:

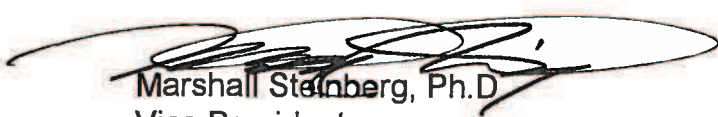
D. A. Cox
Acting Plant Manager

Regulated Facility:

Hercules Incorporated
Hattiesburg, Mississippi

IN WITNESS WHEREOF, I have hereunto affixed my signature on this 2
day of June, 1997.

HERCULES INCORPORATED


Marshall Steinberg, Ph.D.
Vice President
Health & Environment

STATE OF DELAWARE

COUNTY OF NEW CASTLE

SWORN TO and subscribed before me, a notary public in the County and State aforesaid, this 2 day of June, 1997.



Notary Public

CHARLENE E. PISER
NOTARY PUBLIC - DELAWARE
My commission expires April 10, 2001

My Commission expires:

Filo. Forrest Co.
**DRAFT FOR
PUBLIC NOTICE**

DATE: *June 1/97*

State of Mississippi Water Pollution Control PERMIT

TO DISCHARGE WASTEWATER IN ACCORDANCE WITH THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

THIS CERTIFIES THAT

**HERCULES INCORPORATED
HATTIESBURG, MISSISSIPPI**

has been granted permission to discharge wastewater into

001 - unnamed tributary of the Bowie River

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof. This permit is issued in accordance with the provisions of the Mississippi Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: _____

Permit No. MS0001830

Expires: _____

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- During the period beginning on permit issuance, and lasting until three years after permit issuance, the permittee is authorized to discharge from outfall(s) serial number(s) 001 (Process Wastewater and Storm Water).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS		
	kg/day (lbs/day)	Other Units	Measurement	Sample		
	Monthly Avg.	Daily Max.	Monthly Avg.	Daily Max.	Frequency	Type
Flow-M ³ /day (MGD)	--	--	Report	Report	Continuous	Recorder
Biochemical Oxygen Demand (5-Day)	565 (1244)	1055 (2322)	Report	Report	3 Days/Week	24-Hr. Composite
Total Suspended Solids	255 (561)	708 (1557)	Report	Report	3 Days/Week	24-Hr. Composite
Total Organic Carbon	915 79.6 (2755) 3013	372 1104 (2436) 3019	Report	Report	3 Days/Week	24-Hr. Composite
Oil and Grease	300 (660)	450 (990)	Report	Report	3 Days/Week	Grab
Phenol	1.5 (3.3)	2.2 (4.9)	Report	Report	3 Days/Week	Grab

- There shall be no discharge of floating solids or visible foam in other than trace amounts.
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on permit issuance, and lasting until three years after permit issuance, the permittee is authorized to discharge from outfall(s) serial number(s) 002 (Storm Water, Noncontact Cooling Water, and Outfall 001).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS		
	kg/day (lbs/day)	Other Units	(Specify)	Measurement	Sample	
	Monthly Avg.	Daily Max.	Monthly Avg.	Frequency	Type	
Flow-M ³ /day (MGD)	--	--	Report	Continuous	Recorder	
Temperature °C (°F)	--	--	--	3 Days/Week	Grab	
2. The pH shall not be less than 6.5 standard units nor greater than 9.0 standard units and shall be monitored continuously with a grab sample of the effluent.						
3. There shall be no discharge of floating solids or visible foam in other than trace amounts.						
4. The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.						
5. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.						
6. The LC ₅₀ shall pass at less than or equal to 10.7% of the effluent.						

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- During the period beginning three years after permit issuance, and lasting until 2002, the permittee is authorized to discharge from outfall(s) serial number(s) 001 (Process Wastewater).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS		
	kg/day (lbs/day)	Other Units	Measurement	Frequency	Sample Type	Recorder
Flow-M ³ /day (MGD)	Monthly Avg.	Daily Max.	Monthly Avg.	Report	Daily Max.	Continuous
Biochemical Oxygen Demand (5-Day)	79.54 (175.2)	53 (117)	10 mg/l	15 mg/l	3 Days/Week	24-Hr. Composite
Total Suspended Solids	159 (350)	240 (525)	Report	Report	3 Days/Week	24-Hr. Composite
Ammonia Nitrogen (as N)	7.1 (15.6)	10.6 (23.4)	2 mg/l	3 mg/l	3 Days/Week	24-Hr. Composite
Total Organic Carbon	103.5 (228.5)	69.1 (151.7)	Report	Report	3 Days/Week	24-Hr. Composite
Oil and Grease	79.5 (175)	53.1 (117)	Report	Report	3 Days/Week	24-Hr. Composite
Phenol	.54 (1.19)	1.6 (3.5)	0.102 mg/l	0.3 mg/l	3 Days/Week	Grab

- There shall be no discharge of floating solids or visible foam in other than trace amounts.
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.
- Dissolved Oxygen shall not be below 6 ppm and shall be monitored three days per week.
- These limits shall be complied within three (3) years after permit issuance.
- The I₅ shall pass at less than or equal to 100% of the effluent.
- Aluminum, Boron, Nickel, Selenium, Zinc shall be sampled twice per month for six months. Based on the results, toxicity matrix will be reevaluated and the permit shall be modified accordingly.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning three years after permit issuance, and lasting until 2002, the permittee is authorized to discharge from outfall(s) serial number(s) 002 (Storm Water, Noncontact Cooling Water and Outfall 001).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER

DISCHARGE LIMITATIONS

MONITORING REQUIREMENTS

PARAMETER	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	kg/day (lbs/day) Monthly Avg.	Other Units Daily Max. Monthly Avg.	Measurement Frequency	Sample Type
Flow-M ³ /day (MGD)	--	--	Report	Continuous Recorder
Temperature °C (°F)	--	--	Report 32(90)	3 Days/Week Instantaneous

2. The pH shall not be less than 6.5 standard units nor greater than 9.0 standard units and shall be monitored continuously with a grab sample of the effluent.
3. There shall be no discharge of floating solids or visible foam in other than trace amounts.
4. The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.
5. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.

B. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the effluent limitations specified for discharge in accordance with the following schedule:

Upon permit issuance.

2. Within 14 days after either an interim or final date of compliance specified in Part I.B.1., the permittee shall provide the Permit Board with written notice of his compliance or noncompliance with the requirements or conditions specified to be completed by that date.

Not applicable.

C. DEFINITIONS

1. "Monthly average" means the average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during the month. The monthly average for fecal coliform bacteria is the geometric mean of "daily discharges" measured during the calendar month. In computing the geometric mean for fecal coliform bacteria, the value one (1) shall be substituted for sample results of zero.
2. "Daily discharge" means the "discharge of a pollutant" measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurements, the "daily average" is calculated as the average measurement of the discharge of the pollutant over the day.
3. "Daily maximum" means the highest "daily discharge" over a calendar month.

4. "Toxic pollutants" include, but are not limited to: (a) any toxic substance listed in Section 307(a)(1) of the Clean Water Act (CWA), any chemical listed in Section 313(c) of the Superfund Amendments and Reauthorization Act of 1986; and (b) any substance (that is not also a conventional or nonconventional pollutant) for which EPA or the State has published an acute or chronic toxicity criterion.
5. "Hazardous substances" are defined in 40 CFR 116.4.

D. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater.

2. Reporting

- a. Monitoring results obtained during the previous month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1) POSTMARKED NO LATER THAN THE 28TH DAY OF THE MONTH FOLLOWING THE COMPLETED REPORTING PERIOD. THE FIRST REPORT IS DUE ON . Copies of these, and all other reports required herein, shall be signed in accordance with Chapter One Sections II.C. and II.E. of the Mississippi Wastewater Permit Regulations, and shall be submitted to the Mississippi Environmental Quality Permit Board at the following address.

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385

- b. If the results for a given sample analysis are such that any parameter (other than fecal coliform) is not detected at or above the minimum level for the test method used, a value of zero will be used for that sample in calculating an arithmetic mean value for the parameter. If the resulting calculated arithmetic mean value for that reporting period is zero, the permittee shall report "NODI = B" on the DMR. For fecal coliform, a value of 1.0 shall be used in calculating the geometric mean. If the resulting fecal coliform mean value is 1.0, the permittee shall report "NODI = B" on the DMR. For each quantitative sample value that is not detectable, the test method used and the minimum level for that method for that parameter shall be attached to and submitted with the DMR. The permittee shall then be considered in compliance with the appropriate effluent limitation and/or reporting requirement.
- c. If the permittee monitors any pollutant as prescribed in the permit more frequently than required by the permit using test procedures approved under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503, or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Permit Board.
- d. Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Permit Board in the permit.

3. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(h) of the Federal Water Pollution Control Act, as amended or alternative procedures approved and/or promulgated by EPA. For those parameters listed in Exhibit D of the Mississippi Wastewater Permit Regulations, the permittee shall use approved methods with minimum quantification levels as sensitive as those found in Exhibit D of the regulations.

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain records of all information obtained from such monitoring including:

- (a) The exact place, date, and time of sampling;
- (b) The dates the analyses were performed;
- (c) The person(s) who performed the analyses;
- (d) The analytical techniques, procedures or methods used; and
- (e) The results of all required analyses.

5. Records Retention

All records and results of monitoring activities required by this permit, including calibration and maintenance records, shall be retained by the permittee for a minimum of three (3) years, unless otherwise required or extended by the Permit Board, copies of which shall be furnished to the Department upon request.

6. Falsifying Reports

Any permittee who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required by the Permit Board to be maintained as a condition in a permit, or who alters or falsifies the results obtained by such devices or methods and/or any written report required by or in response to a permit condition, shall be deemed to have violated a permit condition and shall be subject to the penalties provided for a violation of a permit condition pursuant to Section 49-17-43 of the Code.

PART II

A. MANAGEMENT REQUIREMENTS

1. Facility Expansion and/or Modification

Any facility expansion, production increases, process modifications, changes in discharge volume or location or other changes in operations or conditions of the permittee which may result in a new or increased discharge of waste, shall be reported to the Permit Board by submission of a new application for a permit pursuant to Section II.A. of the Mississippi Wastewater Regulations, or if the discharges does not violate effluent limitations specified in the permit, by submitting to the Permit Board a notice of a new or increased discharge.

2. Duty to Comply 40 CFR 122.41(a)

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

3. Noncompliance Notification

a. Twenty-Four Hour Reporting

- (1) The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and/or prevent recurrence of the noncompliance.
- (2) The following shall be included as information which must be reported within 24 hours under this paragraph.
 - i. Any unanticipated bypass which exceeds any effluent limitation in the permit.
 - ii. Any upset which exceeds any effluent limitation in the permit.
 - iii. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Permit Board in the permit to be reported within 24 hours.

- (3) The Executive Director may waive the written report on a case-by-case basis for reports under paragraph a. of this section if the oral report has been received within 24 hours.

b. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under paragraph a., at the time monitoring reports are submitted or within 30 days from the end of the month in which the noncompliance occurs. The reports shall contain the information listed in paragraph a.

c. Other Information

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Permit Board, it shall promptly submit such facts or information.

4. Proper Operation, Maintenance and Replacement

The permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. Proper replacement includes maintaining an adequate inventory of replacement equipment and parts for prompt replacement when necessary to maintain continuous collection and treatment of wastewater. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

5. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment.

6. Bypassing

The permittee shall comply with the terms and conditions regarding bypass found in 40 CFR 122.41(m).

7. Upsets

Permittee shall meet the conditions of 40 CFR 122.41(n) regarding "Upsets" and as follows:

- a. Definition. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- b. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph (c) of this section are met. Any determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, shall not constitute final administrative action subject to judicial review.
- c. Conditions necessary for demonstration of upset. A ~~permittee who wishes to establish the affirmative defense~~ of upset shall demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and that the permittee can identify the cause(s) of the upset;
 - (2) The permitted facility was at the time being properly operated; and
 - (3) The permittee submitted notice of the upset as required in 40 CFR 122.41(L) (6) (ii) (B) (24-hour notice of noncompliance).
 - (4) The permittee complied with any remedial measures required under 40 CFR 122.41(d) (Duty to Mitigate).
- d. Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

8. Removed Substances

Solids, sludges, filter backwash, or other residuals removed in the course of treatment or control of wastewater shall be disposed of in a manner such as to prevent such materials from entering State waters and in a manner consistent with the Mississippi Solid Waste Disposal Act, the Federal Resource Conservation and Recovery Act, and the Mississippi Water Pollution Control Act.

9. Power Failures

If electric power is required, in order to maintain compliance with the conditions and prohibitions of the permit, the permittee shall either:

- a. Provide an alternative power source to operate the wastewater control facilities; or, if such alternative power source is not in existence, and no date for its implementation appears in the permit,
- b. Halt, reduce, or otherwise control production and/or all wastewater flows upon reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

1. Inspection and Entry

The permittee shall allow any authorized Commission representative to enter the permittee's premises at any reasonable time, to have access to and copy any applicable records, to inspect process facilities, treatment works, monitoring methods or equipment or to take samples, as authorized by Section 49-17-29 of the Code. In the event of investigation during an emergency response action, a reasonable time shall be any time of the day or night. Follow-up investigations subsequent to the conclusion of the emergency event shall be conducted at reasonable times.

2. Transfer of Ownership or Control

This permit is not transferable to any person except after proper notice and approval by the Permit Board. In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the Mississippi Environmental Quality Permit Board at least thirty (30) days in advance of the proposed transfer date. The notice should include a written agreement between the existing and new permittees containing a specific date for the transfer of permit responsibility, coverage, and liability.

3. Signatory Requirements 40 CFR 122.41(k)

All applications, reports, or information submitted to the Permit Board shall be signed and certified.

a. All permit applications shall be signed as follows:

- (1) For a corporation: by a responsible corporate officer. For the purpose of this Section, a responsible corporate officer means: (1) a president, secretary, treasurer or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy - or decision-making function for the corporation, or (2) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding 25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
- (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.

b. All reports required by the permit and other information requested by the Permit Board shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- (1) The authorization is made in writing by a person described above;
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and
- (3) The written authorization is submitted to the Permit Board.

- c. Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Permit Board prior to or together with any reports, information, or applications.
- d. Certification. Any person signing a document under paragraphs (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

4. Availability of Records

Except for data determined to be confidential under the Mississippi Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the office of the Mississippi Department of Environmental Quality Office of Pollution Control.

5. Duty to Provide Information

- a. The permittee shall furnish to the Permit Board within a reasonable time any relevant information which the Permit Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

6. Toxic Pollutants

The permittee shall comply with any toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) established under Section 307(a) of the Federal Water Pollution Control Act.

7. Toxic Pollutants Notification Requirements

The permittee shall comply with the applicable provisions of 40 CFR 122.42.

8. Civil and Criminal Liability

- a. Any person who violates a term, condition or schedule of compliance contained within this permit or the Mississippi Water Pollution Control Law is subject to the actions defined by law.
- b. Except as provided in permit conditions on "Bypassing" and "Upsets" (Part II, A-6 and 7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.
- c. It shall not be the defense of the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

9. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under Section 311 of the Federal Water Pollution Control Act and applicable provisions under Mississippi Law pertaining to transportation, storage, treatment, or spillage of oil or hazardous substances.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

11. Severability

The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

12. Expiration of Permit

At least 180 days prior to the expiration date of this permit pursuant to the State law and regulation, the permittee who wishes to continue to operate under this permit shall submit an application to the Permit Board for reissuance. The Permit Board may grant permission to submit an application later than this, but no later than the expiration date of the permit.

13. Protection of Confidential Information

- a. Pursuant to Miss. Code Ann. § 49-17-39 and 40 CFR 123.41, the Permit Board shall make available to the public all information contained on any form and all public comments on such information. Effluent data and information concerning air or water quality shall also be made available to the public. Information that is determined by the Commission to be trade secrets shall not be disclosed to the public without prior consent of the source of such information. When a claim of confidentiality is made by a person in accordance with the provisions of Miss. Code Ann. § 49-17-39, a recommendation on the questions of confidentiality shall be made by the Commission and forwarded to the Regional Administrator (or his/her designee) of EPA for his concurrence in such determination of confidentiality.
- b. A copy of a State, UIC, or NPDES permit application, public notice, fact sheet, draft permit and other forms relating thereto, including written public comment and other reports, files and information relating to the application not classified as confidential information by the Commission pursuant to Part II.B.13.a., shall be available for public inspection and copying during normal business hours at the office of the Department in Jackson, Mississippi.
- c. Upon determination by the Commission that information submitted by a permit applicant is entitled to protection against disclosure as trade secrets, the information shall be so labeled and otherwise handled as confidential. Copies of the information and a notice of the Commission's action shall be forwarded to the Regional Administrator (or his/her designee). In making its determination of entitlement to protection as a trade secret, the Commission shall follow the procedure set forth in Miss. Code Ann. § 49-17-39. In the event the Commission denies the claim of confidentiality, the applicant shall have, upon notification thereof, the right to appeal the Commission's determination in the same manner provided for other orders of the Commission. No disclosure, except to EPA, shall be allowed until any appeal from the determination of the Commission is completed.

14. Spill Prevention and Best Management Plans

Any permittee which has above ground bulk storage capacity, of more than 1320 gallons or any single container with a capacity greater than 660 gallons, of materials and/or liquids (including but not limited to, all raw, finished and/or waste material) with chronic or acute potential for pollution impact on waters of the State and not subject to Mississippi Hazardous Waste Management Regulations or 40 CFR 112 (Oil Pollution Prevention) regulations shall provide secondary containment as found in 40 CFR 112 or equivalent protective measures such as trenches or waterways which would conduct any tank releases to a permitted treatment system or sufficient equalization or treatment capacity needed to prevent chronic/acute pollution impact.

PART III

A. REOPENER CLAUSE

This permit shall be modified, or alternately, revoked and reissued, to comply with any applicable effluent standard, limitation or storm water regulation issued or approved under Section 301(b) (2) (C), and (D), 304(b) (2), 307(a) (2) and 402(p) of the Federal Water Pollution Control Act if the effluent standard, limitation or regulation so issued or approved:

1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
2. Controls any pollutant not limited in the permit.

B. CLOSURE REQUIREMENTS

Should the permittee decide to permanently close and abandon the premises upon which it operates, it shall so notify the Permit Board no later than 90 days prior to doing so. This Closure Plan shall address how and when all manufactured products, by-products, raw materials, stored chemicals, and solid and liquid waste and residues will be removed from the premises so that no potential environmental hazard to the waters of the State will be presented.

C. REQUIREMENTS REGARDING COOLING AND BOILER WATER ADDITIVES

Notification shall be made to the permitting authority in writing not later than sixty (60) days prior to initiating the addition of any chemical product to the cooling water and/or boiler water which is subject to discharge, other than those previously approved and/or used. Such notification should include, but not be limited to:

1. Name and composition of the proposed additive,
2. Proposed discharge concentration,
3. Dosage addition rates,
4. Frequency of use,
5. EPA registration, if applicable, and
6. Aquatic species toxicological data.

Written approval must be received from the permitting authority prior to initiating use.

D. OTHER STANDARD CONDITIONS

A Storm Water Pollution Study shall be submitted six months after permit issuance. The Study shall contain the following elements. The rainfall events that cause a bypass of the treatment system shall be identified. Both the intensity and duration of the events shall be listed. The capacity of the system shall be compared to the water generated by a 10-year worst case 24-hour storm. A process storm water minimization plan shall be developed to assess options on diverting flow from plant areas no longer involved in production. In addition, process areas shall be investigated to determine whether berming specific process areas to minimize flow is feasible. A compliance schedule that outlines the steps the facility will take to comply with the upcoming new permit limits shall be submitted within one year of permit issuance. Acute biomonitoring shall be performed for the first three years of the permit (refer to page 20). Chronic biomonitoring shall be conducted for the last two years of permit issuance (refer to page 22).

E. ACUTE BIOASSAY REQUIREMENTS

The Water Quality Standards of Mississippi require that all waters be free from substances in concentrations or combinations which are harmful to humans, animals, or aquatic life (State of Mississippi, Water Quality Criteria for Intrastate, Interstate and Coastal Waters, page 3, adopted November 16, 1995). In accordance with such requirements, the permittee is authorized to discharge from outfall 002 only in accordance with the following conditions:

1. The permittee shall submit any existing toxicity data for review by the Mississippi Office of Pollution Control within 30 days of the effective date of this permit.
2. The permittee shall perform static renewal (tests that exceed 48 hours shall be renewed), definitive (a control and five effluent concentrations) toxicity tests at 25°C in accordance with Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or the most recent edition. Acute toxicity tests will be conducted on 24-hour composite samples of effluent, and tests must be initiated within 36-hours of completion of the sampling period.
 - a. If the Mississippi Office of Pollution Control determines the receiving stream is freshwater, the permittee must use both the following test organisms and test durations:
 - (1) Pimephales promelas (\leq 24-hrs. of age) - 96 hour
 - (2) Ceriodaphnia dubia - 48 hour
 - b. If the Mississippi Office of Pollution Control determines the receiving stream is marine or estuarine, the permittee must use both the following test organisms and test durations:
 - (1) Menidia beryllina - 96 hour
 - (2) Mysidopsis bahia - 48 hour
 - c. Dilution water used for these tests shall consist of reagent grade water, defined as distilled or deionized water that does not contain substances which are toxic to the test organisms. For freshwater tests, dilution water shall consist of reagent grade chemicals or mineral water combined to make moderately hard dilution water according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. For estuarine testing, dilution water shall consist of synthetic seawater or hypersaline brine combined to achieve a salinity of 20 parts per thousand according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. These dilution waters will be deemed acceptable if the survival of the control organisms in the toxicity tests is 90% or greater.
 - d. A standard reference toxicant quality assurance test (acute) shall be conducted concurrently with the effluent tests using both species used in the toxicity tests. Alternatively, if a lab conducts monthly QA/QC reference toxicant tests for both species as part of their SOP, these results may be submitted in lieu of the above mentioned concurrent tests. In either case the reference toxicant test results must be submitted in the final report as well as on the Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.

- c. If the Mississippi Office of Pollution Control determines that the receiving water is estuarine, the permittee shall conduct a *Menidia beryllina* Larval Survival and Growth Test and a *Mysidopsis bahia* Survival, Growth, and Fecundity Test on serial dilutions of effluent to determine if the discharge from outfall(s) 001 is chronically toxic. Such testing will determine if the water affects the survival, growth, and fecundity of the test organisms. Static renewal tests will be conducted on three 24-hour composite samples of effluent. The first of these composite samples will be used to set up the tests and for the day 1 and day 2 renewals, the second of these composite samples will be used to renew the tests on days 3 and 4, and the third composite sample will be used to renew the tests on days 5 and 6. Not more than 36 hours will elapse between sampling and the first use of any of the composite samples. The chronic test(s) shall be considered valid only if the acceptability criteria referenced in Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Marine and Estuarine Organisms, (EPA/600/4-87/028) or most recent edition* are met. All test data shall be statistically analyzed according to the referenced manual.
- d. A standard reference toxicant quality assurance test (chronic) shall be conducted concurrently with the effluent tests using both species used in the toxicity tests. Alternatively, if a lab conducts monthly QA/QC reference toxicant tests with both species as part of their SOP, these results may be submitted in lieu of the above mentioned concurrent tests results. In either case, the reference toxicant test results must be submitted with the final report as well as on the Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.
3. These chronic toxicity tests shall be initiated within 90 days of the date of issuance of the permit to evaluate wastewater toxicity. Such chronic toxicity tests shall be conducted once per quarter for a period of one year following the effective date of the permit. After the first year of monitoring, provided the IC_{25} is greater than or equal to 100%, the frequency of monitoring will be reduced to once per six months for the life of the permit. Sampling shall be timed to cover the seasonal extremes of the year (hot-dry and cold-wet).
4. If any one chronic toxicity test indicates the IC_{25} is less than 100%, the provisions in Section 6 below shall apply, and the permittee shall conduct another chronic toxicity test(s) with the organism(s) that failed. This follow-up test must be completed within 30 days following completion of the failed test. Final chronic toxicity test results shall be in report form as outlined in Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition*. The permittee must also submit a completed Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.
5. In the event the permittee passes the additional WET test, the permittee shall resume testing in accordance with the testing schedule set forth in the permit. In the event the permittee fails the second WET test, the permittee shall submit a Toxicity Reduction Evaluation Plan (TREP) within 45 days following completion of the follow-up test in order to reduce the toxicity of the effluent to safe¹ levels². The first phase of the TREP will include increased monitoring to characterize the toxicity of the effluent.

6. If the IC_{50} of any test is less than 100%, then the effluent will be considered unacceptably chronically toxic, and this will constitute a violation of Part I of this permit.

¹Safe levels will be determined by the Mississippi Environmental Quality Permit Board.

²In large rivers, lakes, and estuaries the permittee must provide a schematic map showing isopleths of waste concentrations.

In addition to the specific conditions of this permit, the permittee shall comply with all applicable conditions of 40 CFR 122.7 and 40 CFR 122.61 (06-03-93).

*Contact the Mississippi Office of Pollution Control Laboratory for information on most recent edition(s) of methods manual.

PERMIT RATIONALE
HERCULES INCORPORATED
HATTIESBURG/FORREST COUNTY
NPDES MS0001830
May 30, 1997

- I. INDUSTRIAL CLASSIFICATION:** Manufacture of modified resins, resin solutions and paper chemicals.
- II. GENERAL DESCRIPTION OF WASTEWATER AND DISCHARGE FLOW:**
The outfall consist of combined coolingwater, processwater, and stormwater flow.
- III. DESCRIPTION OF WASTEWATER TREATMENT:** Sedimentation, floatation, neutralization, and carbon adsorption.
- IV. RECEIVING WATERS:** an unnamed tributary of the Bowie River
-
- V. APPLICABLE GUIDELINES:** 40 CFR Part 454 Gum and Wood Chemical Manufacturing Point Source Category, Subpart C, Woodrosin, Turpentine and Pine Oil.,BAT 40 CFR Part 428 Rubber Manufacturing Point Source Category, BAT.
- VI. PERTINENT DATA FROM FORM 2C:**

A.Outfall 001:

<u>Parameter</u>	<u>max daily</u> (lbs/day)	<u>max 30 day</u> (lbs/day)	<u>long term ave</u> (lbs/day)
BOD	1,747	871	445
TOC	1,352	742	448
COD	3,309	-	-
TSS	542	172	126
NH3N	47	-	-
FLOW	1.94MGD	.96 MGD	.69 MGD
	(mg/l)		
Br.	7.1		
F.	0.15		
N(ORG)	8.9		
O&G	161		
Sulfate	180		
Sulfide	3		

Cont'd

Cont'd

<u>Parameter</u>	<u>max daily</u> (mg/l)
Sulfite	3.8
Surfactant	0.17
Al.	0.22
Boron	0.22
Fe	0.22
Mo	0.009
Mg	0.07
Sn	0.01
Ni	0.01
Se	0.009
Th	0.018
Zinc	0.04
Phenols	0.03
Toluene	0.235
BB phth- alates	0.036
Phenol	0.829

VII. WATER QUALITY CALCULATIONS:

See Attachment I - Chemical Specific Screening.

VIII. CATEGORICAL GUIDELINES CALCULATIONS: 40 CFR Part 454.31 Gum and Wood Chemical Manufacturing Point Source Category, (BAT) and 40 CFR 428 Rubber Manufacturing Point Source Category (BAT).

A. BOD5

Categorical limits: Gum and Wood Chemical Manufacturing and Rubber Manufacturing

<u>Product</u>	<u>lbs/d</u>	<u>40cfr ref.</u>	<u>(lb/1000 lb. production)</u>		<u>lbs/day</u> <u>avg</u>	<u>lbs/day</u> <u>max</u>
			<u>30day ave</u>	<u>max</u>		
resins	536,647	454.31	1.1	2.08	590.3	1116
rubber	65,300	428.103	.12	.08	7.8	5.2
misc. paper chem.	645,695	*	1.0	1.86	<u>646</u>	<u>1201</u>
					1244.1	2322.2

*AVE BOD = $598/601,947 = 1.0$ (LBS BOD/1000 LBS)

MAX BOD = $1121.2/601,947 = 1.86$ (LBS BOD/1000 LBS)

These BOD5 limits are more stringent than previous limits that were based on higher production rates, i.e. 1631 ave, 3051 max.

The Water Quality Monitoring Branch recommended a BOD limit of 2425 LBS/DAY. The categorical limit is more stringent and will be used .

B. TSS

Categorical limits

<u>Product</u>	<u>lbs/d</u>	<u>40 cfr ref</u>	<u>(lb/1000 lb. product)</u>		<u>lb/day</u>	<u>lb/day</u>
			<u>30day ave</u>	<u>max</u>	<u>avg</u>	<u>max</u>
resins	536,647	454.31	0.475	1.38	255	740
rubber	65,300	428.103	0.24	.16	15.7	10.5
misc.						
paper	645,695	*	0.45	1.25	<u>290</u>	<u>807</u>
chem.						
					560.7	1557.5

*AVE TSS = $270/601,947 = 0.45$ (LBS BOD/1000 LBS)

MAX TSS = $750.5/601,947 = 1.25$ (LBS BOD/1000 LBS)

These limits are more stringent than previous limits that were based on higher production rates i.e. 579 ave, 1648 max.

IX. SUMMARY OF CATEGORICAL GUIDELINES AND WATER QUALITY CALCULATIONS, PRESENT AND PROPOSED EFFLUENT PERMIT LIMITATIONS:

A. Outfall 001: INTERIM LIMITATIONS

Average Limitations, (lbs/day):

<u>Parameter</u>	<u>Categorical Guidelines</u>	<u>Water Quality</u>	<u>Present Permit</u>	<u>Proposed Permit</u>	<u>Basis</u>
BOD5	1244	2425	1631	1244	CAT
TSS	561	none	579	561	CAT
TOC	none	none	1755	1755	BPJ
O&G	none	none	660	660	BPJ
Phenol	none	3.3	3.3	3.3	WQ

Maximum Limitations,(lbs/day):

<u>Parameter</u>	<u>Categorical Guidelines</u>	<u>Water Quality</u>	<u>Present Permit</u>	<u>Proposed Permit</u>	<u>BASIS</u>
BOD5	2322	3638	3051	2322	CAT
TSS	1557	none	1648	1557	CAT
TOC	none	none	3800	2436	BPJ
O&G	none	none	990	990	BPJ
Phenol	none	4.9	4.9	4.9	WQ

X. BASIS FOR PROPOSED EFFLUENT LIMITATIONS AND PERMIT REQUIREMENTS:

1. INTERIM LIMITATIONS

A. BOD5

The interim limitations are based on the categorical limitations.

B. TOC

There are no established limits for TOC, therefore the existing limits will be used factoring in the reduced production as compared to production during the last permit period.i.e.: $935,655 / 1,292,400$ (LBS OF PRODUCTS) = 0.72. $0.72 * 3800 = 2,436$ LBS/D MAX

$0.72 * 2,500 = 1,755$ LBS/D AVE. These limits are being met by current technology , activated carbon filter.

C. Oil & grease

The current mass limit, 660 lbs/d ave , 990 lbs/d max, are less than the 10 ppm limit to prevent an oil sheen. i.e. :

$$660 / (116.3 * 8.34) = 0.68 \text{ ppm}$$

D. Phenol

Phenol limits are established by applying the State water quality limits to the river and estimating the maximum allowable concentration in the effluent:

$$0.96 \text{ mgd} * C * 8.34 = 0.3 * (116.3 + 1.4) * 8.34$$

$$C = 37 \text{ PPM MAX.}, = 294.4 \text{ LBS/D}$$

$$C = 12.6 \text{ PPM AVE.}, = 117.4 \text{ LBS/D}$$

Current permit limits are more stringent and will be maintained.

4.9 lbs/d max, 3.3 lbs/d ave.

The current technology, activated carbon filter, is well suited for removing phenol. Since current limits have been maintained they will be continued as representing technology based limits.

2. FINAL LIMITS

A. BOD5

Water Quality Monitoring limit for a 7Q10 = 0 stream is BOD5 ave = 10mg/l .

Mass limits BOD5

$$1.4 * 8.34 * 10 \text{mg/l} = 117 \text{ lbs/d ave}$$

$$1.4 * 8.34 * 15 \text{mg/l} = 175 \text{ lbs/d max}$$

The following current discharge mass loadings from the application illustrates that the Current control technology has not been reaching the proposed limits.

<u>Max. daily</u>	<u>Max 30 day ave</u>
1747 lbs/d	871 lbs/d

B. TSS

Proposed limits are based upon Best Professional Judgement.

$$\text{AVE} = 30 \text{ PPM} \quad \text{MAX} = 45 \text{ PPM}$$

$$1.4 \text{MGD} * 8.34 * 30 \text{MG/L} = 350 \text{ LBS/D}$$

$$1.4 \text{MGD} * 8.34 * 45 \text{MG/L} = 525 \text{ LBS/D}$$

The existing system can meet the average but not the max limit as illustrated by the following 2-C information.

TSS reported : 126 LBS/D AVE , 542 LBS/D MAX

C. Oil and Grease

Proposed limits : 10 mg/l ave , 15 mg/l max

$$1.4 * 8.34 * 10 \text{ mg/l} = 116.7 \text{ lbs/d}$$

$$1.4 * 8.34 * 15 \text{ mg/l} = 175 \text{ lbs/d}$$

The proposed limits are based upon the minimum amount of oil that will produce an oil sheen on the water surface.

D. Phenol

State Water Quality Limits are 0.3 mg/l max, 0.102 mg/l ave.

These limits translate to :

$$0.3 \text{ mg/l} * 1.4 \text{ MGD} * 8.34 = 3.5 \text{ LBS/D}$$

$$0.102 \text{ MG/L} * 1.4 \text{ MGD} * 8.34 = 1.19 \text{ LBS/D}$$

These discharge limits are more stringent than previous limits.

(4.9 lbs/d , 3.3 lbs/d ave) Form 2-C list Phenol at a concentration of 0.829 mg/l. This concentration is above the proposed limits.

E. TOC

There are no established limits for TOC, therefore the existing limits will be used factoring in the reduced production as compared to production during the last permit period ie: $935,655 / 1,292,400 \text{ (LBS OF PRODUCTS)} = 0.72$. $0.72 * 3800 = 2,436 \text{ LBS/D MAX}$

$0.72 * 2500 = 1755 \text{ LBS/D AVE}$. These limits are being met by current technology, activated carbon filter.

XI. PROPOSED LIMITS FOR DISCHARGE , FINAL LIMITS (lbs/day)

	<u>Monthly ave.</u>	<u>Daily Max.</u>	<u>existing limits</u>		
			<u>ave</u>	<u>max</u>	<u>Basis</u>
BOD5	53(116.8)	79.54(175.2)	(1634)	(3051)	WQ
Am.(N)	10.6(23.35)	15.92(35)	NONE	NONE	WQ
TSS	191(421)	531(1170)	(579)	(1648)	BPJ
TOC	796(1755)	1107(2436)	(2500)	(3800)	BPJ
Oil/g	53.1(117)	79.5(175)	(660)	(990)	BPJ
Phenol	.54(1.19)	1.6(3.5)	(3.3)	(4.9)	WQ
Chronic Toxicity Monotoring					

XII. PROPOSED LIMITS, INTERIM LIMITS (lbs/day)

	<u>Monthly ave</u>	<u>Daily Max</u>	<u>existing limits</u>		
			<u>ave</u>	<u>max</u>	<u>Basis</u>
BOD5	565.5(1244.1)	1056(2322.2)	(1634)	(3051)	CAT
TSS	255(560.7)	708(1557.5)	(579)	(1648)	CAT
TOC	796(1755)	1107(2436)	(2500)	(3800)	BPJ
Oil/g	300(660)	450(990)	(660)	(990)	BPJ
Phenol	1.5(3.3)	2.2(4.9)	(3.3)	(4.9)	WQ
Acute Toxicity Monitoring					

XIII. BATEA STATEMENT: It is our Best Professional Judgement (BPJ) the foregoing effluent limitations and permit conditions represent Best Available Technology Economically Achievable (BATEA).

ATTACHMENT I

TOXICITY SCREENING FOR BOWIE RIVER

$Q_w = .96 \text{ MGD}$ (TOTAL 1.4 INCLUDES NON-CONTACT COOLING WATER)

$Q_r = 116.3 \text{ MGD}$

$\text{IWC} = 0.96 \text{ MGD} / (1.4 + 116.3) * 100\% = .8\%$

$X_r = 0$ assumed for all parameters

Total Al

$X_w = .220 * 10 = 2.2$ (less than 12 samples)

$X_t = 2.2 * .96 / (1.4 + 116.3) = .02 \text{ mg/l}$

$\text{AWQC} = .750 \text{ mg/l}$

$\text{CWQC} = .087 \text{ mg/l}$

Total Boron

$X_w = .22 * 10 = 2.2$ (less than 12 samples)

$X_t = 2.2 * .96 / (1.4 + 116.3) = .020$

$\text{AWQC} = \text{no data}$

$\text{CWQC} = .750 \text{ mg/l}$

Total Ni

$X_w = .01 * 10 = .1$ (less than 12 samples)

$X_t = .1 * .96 / (1.4 + 116.3) = .0008$

$\text{AWQC} = .787 \text{ mg/l}$

$\text{CWQC} = .087 \text{ mg/l}$

Total Selenium

$X_w = .009 * 10 = .09$ (less than 12 samples)

$X_t = .09 * .96 / (1.4 + 116.3) = .0008$

$\text{AWQC} = .02 \text{ mg/l}$

$\text{CWQC} = .005 \text{ mg/l}$

Total Zinc

$X_w = .04 * 10 = .4$ (less than 12 samples)

$X_t = .4 * .96 / (1.4 + 116.3) = .0042$

$\text{AWQC} = .0636 \text{ mg/l}$

$\text{CWQC} = .0581 \text{ mg/l}$

Phenol

$X_w = .829 \text{ mg/l}$

$X_t = .829 * .96 / (1.4 + 116.3) = .0083 \text{ mg/l}$

$AWQC = .3 \text{ mg/l}$

$CWQC = .1 \text{ mg/l}$

ACUTE TOXICITY SCREENING SUMMARY (EXISTING LIMIT BASIS)

<u>Parameter</u>	<u>AWOC</u> mg/l	<u>Xt</u> mg/l	<u>PASS/FAIL</u>
Total Al	.750	.026	PASS
Total Boron	no data	.02	
Total Nickel	.787	.0012	PASS
Total Selenium	.02	.001	PASS
Total Zinc	.0636	.005	PASS
Phenol	.3	.099	PASS

CHRONIC TOXICITY SCREENING SUMMARY

<u>Parameter</u>	<u>CWOC</u> mg/l	<u>Xt</u> mg/l	<u>PASS/FAIL</u>
Total Al	.087	.026	PASS
Total Boron	.750	.02	PASS
Total Nickel	.087	.0012	PASS
Total Selenium	.005	.001	PASS
Total Zinc	.0581	.005	PASS
Phenol	.102	.099	PASS

TOXICITY SCREENING MATRIX

permit requirements

<u>IWC</u>	<u>CSSa</u>	<u>CSSp</u>	<u>WETp</u>	<u>CSI</u>	<u>WETl</u>	<u>WETm</u>
2.4%	P	P	P	Y	Y	N/A

TOXICITY SCREEN FOR TRIBUTARY

ACUTE TOXICITY SCREENING SUMMARY

($X_t = X_w \cdot .96/1.4$)

<u>Parameter</u>	<u>AWOC</u> mg/l	<u>Xt</u> mg/l	<u>PASS/FAIL</u>
Total Al	.750	1.5	FAIL
Total Boron	no data		
Total Nickel	.787	.68	FAIL
Total Selenium	.02	.062	FAIL
Total Zinc	.0636	.272	FAIL
Phenol	.3	.564	FAIL

CHRONIC TOXICITY SCREENING SUMMARY

($X_t = X_w \cdot .96/1.4$)

<u>Parameter</u>	<u>CWOC</u> mg/l	<u>Xt</u> mg/l	<u>PASS/FAIL</u>
Total Al	.087	1.5	FAIL
Total Boron	.750	1.5	FAIL
Total Nickel	.087	.068	PASS
Total Selenium	.005	.062	FAIL
Total Zinc	.0581	.272	FAIL
Phenol	.102	.564	FAIL

TOXICITY SCREENING MATRIX

permit requirements

<u>IWC</u>	<u>CSSa</u>	<u>CSSp</u>	<u>WETp</u>	<u>CSI</u>	<u>WETl</u>	<u>WETm</u>
100%	f	f	N/A	Y	Y	N/A

FACT SHEET

**APPLICATION FOR
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
PERMIT TO DISCHARGE WASTEWATER TO WATERS
OF THE STATE OF MISSISSIPPI**

Application No.: MS0001830 (Reissuance)

Date: June 4,1997

1. SYNOPSIS OF APPLICATION

a. Name and Address of Applicant

**Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39401
Contact: Mr. Charles Jordan
(601) 545-3450**

b. Description of Applicant's Operation

Manufacture of modified resins, resin solutions and paper chemicals.

Applicable guidelines:

**40CFR Part 454 Gum and Wood Chemical Manufacturing Point
Source Category, Subpart C Woodrosin, Turpentine and Pine Oil.
40CFR Part 428 Rubber Manufacturing Point Source Category,**

c. Production Capacity of Facility

N/A

d. Description of Existing Pollution Abatement Facilities

Sedimentation, floatation, neutralization, and carbon adsorption.

e. Applicant's Receiving Waters

Bowie River

f. Description of Discharges

**Outfall 001 - 0.96 MGD(internal outfall into 002)
Outfall 002 - 1.4 MGD**

Bowie River 7Q10 =116.3 mgd

2. PROPOSED EFFLUENT LIMITATIONS

see rationale

3. MONITORING REQUIREMENTS

The applicant will be required to monitor regularly for flow and those parameters limited in Section 2 above with sufficient frequency to ensure compliance with the permit conditions. Frequency, methods of sampling, and reporting dates will be specified in the final permit. Acute Toxicity Monitoring will be performed for the first three years of the permit. The required passing dilution is three percent. Chronic Toxicity Monitoring shall be performed for the last two years of the permit. The required passing dilution is one-hundred percent.

4. PROPOSED COMPLIANCE SCHEDULE FOR ATTAINING EFFLUENT LIMITATIONS

The facility will have three years to achieve proposed permit requirements.

5. PROPOSED CONDITIONS OF APPLICABILITY AND OTHER REQUIREMENTS

See attached permit rationale.

6. WATER QUALITY STANDARDS AND EFFLUENT STANDARDS APPLIED TO THE DISCHARGE

See attached permit rationale.

7. PROCEDURES FOR THE FORMULATION OF FINAL DETERMINATIONS

a. Comment Period

The Mississippi Office of Environmental Quality Permit Board proposes to issue an NPDES permit to this applicant subject to the effluent limitations and special conditions outlined above. These determinations are tentative.

Interested persons are invited to submit written comments on the permit application or on the Permit Board's proposed determinations to the following address:

**Mississippi Department of Environmental Quality
Office of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209**

Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing Jerry Cain at the Permit Board's address or calling Charles Cook at 961-5171.

All comments received prior to June 30, 1997, will be considered in the formulation of final determinations with regard to this application.

b. Public Hearing

The Permit Board may hold a public hearing if there is a significant degree of public interest in a proposed permit or group of permits. Public notice of such a hearing will be circulated in newspapers in the geographical area of the discharge and to those on the agency's mailing list at least 30 days prior to the hearing.

Following the public hearing, the Permit Board may take such modifications in the terms and conditions of the proposed permits as may be appropriate and shall issue or deny the permit. Notice of issuance or denial will be circulated to those who participated in the hearing and to appropriate persons on the mailing list.

c. Issuance of the Permit When No Public Hearing is Held

If no public hearing is held, and, after review of the comments received, the Permit Board's determinations are substantially unchanged, the permit will be issued and become effective immediately.

If no public hearing is held, but there have been substantial changes, public notice of the Permit Board's revised determinations will be made. Following a 30-day comment period, the permit will be issued and become effective immediately, unless a public hearing is granted.

PUBLIC NOTICE
Mississippi Environmental Quality Permit Board
P. O. Box 10385
Jackson, MS 39209
Telephone No. (601) 961-5171

June 1, 1997

Hercules Incorporated, located at 613 West 7th Street P.O.10385 Hattiesburg, Ms. 39209, has applied to the Mississippi Environmental Quality Permit Board for the reissuance of an NPDES Permit to discharge treated chemical process waste water and non-contact coolingwater from a waste water treatment system to a tributary of the Bowie River. The applicant's operation manufactures resins and paper chemicals. One discharge is described in the application.

The environmental impact of this project has been evaluated and the staff of the Permit Board believes that, with proper environmental constraints and limitations on the applicant, this project will operate within all State and Federal environmental laws and standards. Therefore, the staff of the Board has preliminarily decided, based on available information, to recommend to the Board that a permit be issued containing numerous environmental regulatory constraints specifically stated in the draft permit. However, before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Jerry Cain at the Permit Board's address shown above, no later than June 30, 1997. All comments received by that date will be considered in the formulation of final determinations regarding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit.

Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing or calling Charles Cook at the Permit Board's address and telephone number shown above. Also, this and other information is available for review and copying during normal business hours at the Southport Center Building located at 2380 Highway 80 West, Jackson, MS.

Please bring the foregoing to the attention of persons whom you know will be interested.

**State of Mississippi
Water Pollution Control**

DATE: OCT. 22, 1991
FINAL

PERMIT

**TO DISCHARGE WASTEWATER IN ACCORDANCE WITH THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

THIS CERTIFIES THAT

**HERCULES INCORPORATED
HATTIESBURG, MISSISSIPPI**

has been granted permission to discharge wastewater into

Bowie River

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof. This permit is issued in accordance with the provisions of the Mississippi Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD



**HEAD, OFFICE OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Issued: October 22, 1991

Permit No. MS0001830

Expires: October 21, 1996

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning October 22, 1991, and lasting until October 21, 1996, the permittee is authorized to discharge from outfall(s) serial number(s) 002 (Total Facility Discharge - Process Wastewater, Non-Contact Cooling Water and Stormwater Runoff).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS		
	kg/day (lbs/day)	Other Units	(Specify)	Measurement	Sample	
	Daily Avg.	Daily Max.	Daily Avg.	Frequency	Type	
Flow-M ³ /day (MGD)	N/A	N/A	Report	Continuous	Recorder	
Temperature °C(°F)	N/A	N/A	N/A	3 Days/Week	Grab	

2. The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units and shall be monitored daily with a grab sample of the effluent.

3. There shall be no discharge of floating solids or visible foam in other than trace amounts.

4. The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.

5. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after mixing with Outfall (001) but prior to mixing with the receiving stream.

6. No chemicals, such as chlorine, zinc or chromium shall be added to the cooling water without the prior written approval by the Office of Pollution Control in accordance with Part III.C. page 14 of 16.

C. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. Reporting

Monitoring results obtained during the previous month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1) POSTMARKED NO LATER THAN THE 28TH DAY OF THE MONTH FOLLOWING THE COMPLETED REPORTING PERIOD. THE FIRST REPORT IS DUE ON DECEMBER 28, 1991. Copies of these, and all other reports required herein, shall be signed in accordance with Sections 6 and 7 of the Mississippi Wastewater Permit Regulations, and shall be submitted to the Mississippi Environmental Quality Permit Board at the following address.

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385

3. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(h) of the Federal Water Pollution Control Act, as amended.

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- (a) The exact place, date, and time of sampling;
- (b) The dates the analyses were performed;
- (c) The person(s) who performed the analyses;
- (d) The analytical techniques or methods used; and
- (e) The results of all required analyses.

5. Records Retention

- (a) All records and information resulting from the monitoring activities required by this permit (including all records of; analyses performed; calibration and maintenance of instrumentation; and recording from continuous monitoring instrumentation) shall be retained for a minimum of three (3) years, or longer if requested by the Permit Board.

PART II

A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions or treatment modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new NPDES application. If such changes will not violate the effluent limitations specified in this permit, and upon written notice (in lieu of a new NPDES application) to the Mississippi Environmental Quality Permit Board, the permit may be modified to specify and limit any pollutants not previously limited.

2. Duty to Comply 40 CFR 122.41(a)

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, renovation and reissuance, or modification; or for denial of a permit renewal application.

3. Noncompliance Notification

If, for any reason, the permittee does not comply with or will be unable to comply with any provision specified in this permit, the permittee shall notify the Mississippi Environmental Quality Permit Board orally within 24 hours of becoming aware of such conditions. A written report shall also be provided within five (5) days of such time and shall contain the following information:

- a. A description of the discharge and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

4. Facilities Operation

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

(3) The permittee submitted notice of the upset as required in 40 CFR 122.41 (L)(6)(ii)(B) (24 hour notice of noncompliance).

(4) The permittee complied with any remedial measures required under 40 CFR 122.41 (d) (duty to mitigate).

d. Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

8. Removed Substances

Solids, sludges, filter backwash, or other residuals removed in the course of treatment or control of wastewater shall be disposed of in a manner such as to prevent such materials from entering State waters and in a manner consistent with the Mississippi Solid Waste Disposal Act and the Federal Resource Conservation and Recovery Act.

9. Power Failures

In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

- a. In accordance with the Schedule of Compliance contained in Part I, provide an alternate power source sufficient to operate the wastewater collection and treatment facilities, or, if such alternate power source is not in existence, and no date for its implementation appears in Part I;
- b. Provide a method whereby the effluent limitations contained in Part I shall be met upon the reduction, loss, or failure of the primary source of power to the wastewater collection and treatment facilities.

B. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Mississippi Environmental Quality Permit Board and the Regional Administrator of the U. S. Environmental Protection Agency and/or their authorized representatives, upon the presentation of credentials.

- a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and

- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and
 - (3) The written authorization is submitted to the Permit Board.
- c. Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Permit Board prior to or together with any reports, information, or applications.
- d. Certification. Any person signing a document under paragraphs (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

4. Availability of Records

Except for data determined to be confidential under the Mississippi Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the office of the Mississippi Department of Environmental Quality Office of Pollution Control.

9. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under Section 311 of the Federal Water Pollution Control Act and applicable provisions of the Mississippi Water Pollution Control Law pertaining to spills of oil and hazardous materials.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

11. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstance, and the remainder of this permit, shall not be affected thereby.

12. Expiration of Permit

The permittee shall not discharge after the expiration date of this permit unless he has submitted a completed application for reissuance no later than 180 days prior to the expiration date. The Head of the Office of Pollution Control may grant permission to submit an application later than this, but no later than the expiration date of the permit.

D. ACUTE BIOASSAY REQUIREMENTS

The Water Quality Standards of Mississippi require that all waters be free from substances in concentrations or combinations which are harmful to humans, animals, or aquatic life (State of Mississippi, Water Quality Criteria for Intrastate, Interstate and Coastal Waters, Section II.4. Minimum Conditions Applicable to All Waters, page 3, adopted March 22, 1990). In accordance with such requirements, the permittee is authorized to discharge from the combined outfall(s) 001 and 002 only in accordance with the following conditions:

1. The permittee shall perform 48-hour static definitive toxicity tests in accordance with Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms Third Edition, (EPA-600/4-85/013). Static tests will be conducted on a 24-hour composite sample of effluent. Less than 36 hours will elapse between sampling and the use of the sample.
 - a. The permittee must use both the following organisms:
 - (1) Pimephales promelas (fathead minnows)
 - (2) Ceriodaphnia dubia (water fleas)
 - b. Dilution water used for these tests shall consist of reagent grade water, defined as distilled or deionized water that does not contain substances which are toxic to the test organisms. Dilution water shall consist of reagent grade water to which the appropriate reagent grade salts have been added to make moderately hard dilution water according to Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms (EPA/600/4-89/001). These dilution waters will be deemed acceptable if the control organisms in the toxicity tests meet the minimum EPA criteria for mortality.

DRAFT

**State of Mississippi
Water Pollution Control
PERMIT**

TO DISCHARGE WASTEWATER IN ACCORDANCE WITH THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

THIS CERTIFIES THAT

**HERCULES INCORPORATED
HATTIESBURG, MISSISSIPPI**

has been granted permission to discharge wastewater into

001 - unnamed tributary of the Bowie River

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof. This permit is issued in accordance with the provisions of the Mississippi Water Pollution Control Law (Section 49-17-1 et seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder, and under authority granted pursuant to Section 402(b) of the Federal Water Pollution Control Act.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

**HEAD, OFFICE OF POLLUTION CONTROL
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

Issued:

Permit No. MS0001830

Expires:

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- During the period beginning 1996, and lasting until 1999, the permittee is authorized to discharge from outfall(s) serial number(s) 001 (Process Wastewater).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS		
	kg/day Monthly Avg.	(lbs/day) Daily Max.	Other Units Monthly Avg.	(Specify) Daily Max.	Measurement Frequency	Sample Type
Flow-M ³ /day (MGD)	--	--	Report	Report	Continuous	Recorder
Biochemical Oxygen Demand (5-Day)	4242(933)	795(1751)	Report	Report	3 Days/Week	24-Hr. Composite
Total Suspended Solids	191(421)	531(1170)	Report	Report	3 Days/Week	24-Hr. Composite
Total Organic Carbon	796(1755)	1107(2436)	Report	Report	3 Days/Week	24-Hr. Composite
Oil and Grease	300(660)	450(990)	Report	Report	3 Days/Week	24-Hr. Composite
Phenol	1.5(3.3)	2.2(4.9)	Report	Report	3 Days/Week	Grab

- There shall be no discharge of floating solids or visible foam in other than trace amounts.
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning 1999, and lasting until 2000, the permittee is authorized to discharge from outfall(s) serial number(s) 002 (Storm Water, Noncontact Cooling Water, and Outfall 001).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS		
	kg/day (lbs/day)	Other Units	Measurement	Frequency	Sample Type	
	Monthly Avg.	Daily Max.	Monthly Avg.	Report	Continuous	Recorder
Flow-M ³ /day (MGD)	--	--	Report	41(105)	3 Days/Week	Grab
Temperature °C (°F)	--	--	--			

2. The pH shall not be less than 6.5 standard units nor greater than 9.0 standard units and shall be monitored continuously with a grab sample of the effluent.
3. There shall be no discharge of floating solids or visible foam in other than trace amounts.
4. The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.
5. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

- During the period beginning 1999, and lasting until 2000², the permittee is authorized to discharge from outfall(s) serial number(s) 001 (Process Wastewater).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER	DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS			
	kg/day (lbs/day)	Other Units	(Specify)	Measurement	Sample		
	Monthly Avg.	Daily Max.	Monthly Avg.	Frequency	Type		
Flow-M ³ /day (MGD)	--	--	Report	Continuous	Recorder		
Biochemical Oxygen Demand (5-Day)	79.54(175.2)	53(117)	Report	3 Days/Week	24-Hr. Composite		
Total Suspended Solids	159(350)	240(525)	Report	3 Days/Week	24-Hr. Composite		
Ammonia Nitrogen (as N)	7.1(15.6)	10.6(23.4)	Report	3 Days/Week	24-Hr. Composite		
Total Organic Carbon	796(1755)	1107(2436)	Report	3 Days/Week	24-Hr. Composite		
Oil and Grease	79.5(175)	53.1(117)	Report	3 Days/Week	Grab		
Phenol	.54(1.19)	1.6(3.5)	Report	3 Days/Week	Grab		

- There shall be no discharge of floating solids or visible foam in other than trace amounts.
- The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.
- Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.
- These limits shall be complied with¹ three (3) years after permit issuance.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning , and lasting until , the permittee is authorized to discharge from outfall(s) serial number(s) 002 (Storm Water, Noncontact Cooling Water and Outfall 001).

Such discharges shall be limited and monitored by the permittee as specified below:

PARAMETER

DISCHARGE LIMITATIONS

MONITORING REQUIREMENTS

PARAMETER	kg/day (lbs/day)		Other Units	(Specify) Daily Max.	Measurement Frequency	Sample Type
	Monthly Avg.	Daily Max.	Monthly Avg.			
Flow-M ³ /day (MGD)	--	--	Report	Report	Continuous	Recorder
Temperature °C (°F)	--	--	Report	32 (90)	3 Days/Week	Instantaneous

2. The pH shall not be less than 6.5 standard units nor greater than 9.0 standard units and shall be monitored continuously with a grab sample of the effluent.
3. There shall be no discharge of floating solids or visible foam in other than trace amounts.
4. The discharge shall not cause the occurrence of a visible sheen on the surface of the receiving waters.
5. Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): the nearest accessible point after final treatment but prior to mixing with the receiving streams.

B. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the effluent limitations specified for discharge in accordance with the following schedule:

Upon permit issuance

2. Within ^{10 d/c 5th ET} 14 days after either an interim or final date of compliance specified in Part I.B.1., the permittee shall provide the Permit Board with written notice of his compliance or noncompliance with the requirements or conditions specified to be completed by that date.

Not applicable.

C. DEFINITIONS

1. "Monthly average" means the average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during the month. The monthly average for fecal coliform bacteria is the geometric mean of "daily discharges" measured during the calendar month. In computing the geometric mean for fecal coliform bacteria, the value one (1) shall be substituted for sample results of zero.
2. "Daily discharge" means the "discharge of a pollutant" measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurements, the "daily average" is calculated as the average measurement of the discharge of the pollutant over the day.
3. "Daily maximum" means the highest "daily discharge" over a calendar month.

4. "Toxic pollutants" include, but are not limited to: (a) any toxic substance listed in Section 307(a)(1) of the Clean Water Act (CWA), any chemical listed in Section 313(c) of the Superfund Amendments and Reauthorization Act of 1986; and (b) any substance (that is not also a conventional or nonconventional pollutant) for which EPA or the State has published an acute or chronic toxicity criterion.
5. "Hazardous substances" are defined in 40 CFR 116.4.

D. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored wastewater.

2. Reporting

- a. Monitoring results obtained during the previous month shall be summarized and reported on a Discharge Monitoring Report Form (EPA No. 3320-1) POSTMARKED NO LATER THAN THE 28TH DAY OF THE MONTH FOLLOWING THE COMPLETED REPORTING PERIOD. THE FIRST REPORT IS DUE ON . Copies of these, and all other reports required herein, shall be signed in accordance with Chapter One Sections II.C. and II.E. of the Mississippi Wastewater Permit Regulations, and shall be submitted to the Mississippi Environmental Quality Permit Board at the following address.

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF POLLUTION CONTROL
P. O. Box 10385
Jackson, Mississippi 39289-0385

- b. If the results for a given sample analysis are such that any parameter (other than fecal coliform) is not detected at or above the minimum level for the test method used, a value of zero will be used for that sample in calculating an arithmetic mean value for the parameter. If the resulting calculated arithmetic mean value for that reporting period is zero, the permittee shall report "NODI = B" on the DMR. For fecal coliform, a value of 1.0 shall be used in calculating the geometric mean. If the resulting fecal coliform mean value is 1.0, the permittee shall report "NODI = B" on the DMR. For each quantitative sample value that is not detectable, the test method used and the minimum level for that method for that parameter shall be attached to and submitted with the DMR. The permittee shall then be considered in compliance with the appropriate effluent limitation and/or reporting requirement.
- c. If the permittee monitors any pollutant as prescribed in the permit more frequently than required by the permit using test procedures approved under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503, or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Permit Board.
- d. Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Permit Board in the permit.

3. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(h) of the Federal Water Pollution Control Act, as amended or alternative procedures approved and/or promulgated by EPA. For those parameters listed in Exhibit D of the Mississippi Wastewater Permit Regulations, the permittee shall use approved methods with minimum quantification levels as sensitive as those found in Exhibit D of the regulations.

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall maintain records of all information obtained from such monitoring including:

- (a) The exact place, date, and time of sampling;
- (b) The dates the analyses were performed;
- (c) The person(s) who performed the analyses;
- (d) The analytical techniques, procedures or methods used; and
- (e) The results of all required analyses.

5. Records Retention

All records and results of monitoring activities required by this permit, including calibration and maintenance records, shall be retained by the permittee for a minimum of three (3) years, unless otherwise required or extended by the Permit Board, copies of which shall be furnished to the Department upon request.

6. Falsifying Reports

Any permittee who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required by the Permit Board to be maintained as a condition in a permit, or who alters or falsifies the results obtained by such devices or methods and/or any written report required by or in response to a permit condition, shall be deemed to have violated a permit condition and shall be subject to the penalties provided for a violation of a permit condition pursuant to Section 49-17-43 of the Code.

PART II

A. MANAGEMENT REQUIREMENTS

1. Facility Expansion and/or Modification

Any facility expansion, production increases, process modifications, changes in discharge volume or location or other changes in operations or conditions of the permittee which may result in a new or increased discharge of waste, shall be reported to the Permit Board by submission of a new application for a permit pursuant to Section II.A. of the Mississippi Wastewater Regulations, or if the discharges does not violate effluent limitations specified in the permit, by submitting to the Permit Board a notice of a new or increased discharge.

2. Duty to Comply 40 CFR 122.41(a)

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

3. Noncompliance Notification

a. Twenty-Four Hour Reporting

- (1) The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and/or prevent recurrence of the noncompliance.
- (2) The following shall be included as information which must be reported within 24 hours under this paragraph.
 - i. Any unanticipated bypass which exceeds any effluent limitation in the permit.
 - ii. Any upset which exceeds any effluent limitation in the permit.
 - iii. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Permit Board in the permit to be reported within 24 hours.

- (3) The Executive Director may waive the written report on a case-by-case basis for reports under paragraph a. of this section if the oral report has been received within 24 hours.

b. Other Noncompliance

The permittee shall report all instances of noncompliance not reported under paragraph a., at the time monitoring reports are submitted or within 30 days from the end of the month in which the noncompliance occurs. The reports shall contain the information listed in paragraph a.

c. Other Information

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Permit Board, it shall promptly submit such facts or information.

4. Proper Operation, Maintenance and Replacement

The permittee shall at all times properly operate, maintain, and when necessary, promptly replace all facilities and systems of collection, treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes adequate laboratory controls and appropriate quality assurance procedures. Proper replacement includes maintaining an adequate inventory of replacement equipment and parts for prompt replacement when necessary to maintain continuous collection and treatment of wastewater. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

5. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of the permit which has a reasonable likelihood of adversely affecting human health or the environment.

6. Bypassing

The permittee shall comply with the terms and conditions regarding bypass found in 40 CFR 122.41(m).

7. Upsets

Permittee shall meet the conditions of 40 CFR 122.41(n) regarding "Upsets" and as follows:

- a. Definition. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- b. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph (c) of this section are met. Any determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, shall not constitute final administrative action subject to judicial review.
- c. Conditions necessary for demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and that the permittee can identify the cause(s) of the upset;
 - (2) The permitted facility was at the time being properly operated; and
 - (3) The permittee submitted notice of the upset as required in 40 CFR 122.41(L) (6) (ii) (B) (24-hour notice of noncompliance).
 - (4) The permittee complied with any remedial measures required under 40 CFR 122.41(d) (Duty to Mitigate).
- d. Burden of proof. In any enforcement proceeding the permittee seeking to establish the occurrence of an upset has the burden of proof.

8. Removed Substances

Solids, sludges, filter backwash, or other residuals removed in the course of treatment or control of wastewater shall be disposed of in a manner such as to prevent such materials from entering State waters and in a manner consistent with the Mississippi Solid Waste Disposal Act, the Federal Resource Conservation and Recovery Act, and the Mississippi Water Pollution Control Act.

9. Power Failures

If electric power is required, in order to maintain compliance with the conditions and prohibitions of the permit, the permittee shall either:

- a. Provide an alternative power source to operate the wastewater control facilities; or, if such alternative power source is not in existence, and no date for its implementation appears in the permit,
 - b. Halt, reduce, or otherwise control production and/or all wastewater flows upon reduction, loss, or failure of the primary source of power to the wastewater control facilities.
-

B. RESPONSIBILITIES

1. Inspection and Entry

The permittee shall allow any authorized Commission representative to enter the permittee's premises at any reasonable time, to have access to and copy any applicable records, to inspect process facilities, treatment works, monitoring methods or equipment or to take samples, as authorized by Section 49-17-29 of the Code. In the event of investigation during an emergency response action, a reasonable time shall be any time of the day or night. Follow-up investigations subsequent to the conclusion of the emergency event shall be conducted at reasonable times.

2. Transfer of Ownership or Control

This permit is not transferable to any person except after proper notice and approval by the Permit Board. In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the Mississippi Environmental Quality Permit Board at least thirty (30) days in advance of the proposed transfer date. The notice should include a written agreement between the existing and new permittees containing a specific date for the transfer of permit responsibility, coverage, and liability.

3. Signatory Requirements 40 CFR 122.41(k)

All applications, reports, or information submitted to the Permit Board shall be signed and certified.

a. All permit applications shall be signed as follows:

- (1) For a corporation: by a responsible corporate officer. For the purpose of this Section, a responsible corporate officer means: (1) a president, secretary, treasurer or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy - or decision-making function for the corporation, or (2) the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding 25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
- (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.

b. All reports required by the permit and other information requested by the Permit Board shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

- (1) The authorization is made in writing by a person described above;
- (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, position having overall responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.); and
- (3) The written authorization is submitted to the Permit Board.

- c. Changes to authorization. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Permit Board prior to or together with any reports, information, or applications.
- d. Certification. Any person signing a document under paragraphs (a) or (b) of this section shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under the direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

4. Availability of Records

Except for data determined to be confidential under the Mississippi Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the office of the Mississippi Department of Environmental Quality Office of Pollution Control.

5. Duty to Provide Information

- a. The permittee shall furnish to the Permit Board within a reasonable time any relevant information which the Permit Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit.

6. Toxic Pollutants

The permittee shall comply with any toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) established under Section 307(a) of the Federal Water Pollution Control Act.

7. Toxic Pollutants Notification Requirements

The permittee shall comply with the applicable provisions of 40 CFR 122.42.

8. Civil and Criminal Liability

- a. Any person who violates a term, condition or schedule of compliance contained within this permit or the Mississippi Water Pollution Control Law is subject to the actions defined by law.
- b. Except as provided in permit conditions on "Bypassing" and "Upsets" (Part II, A-6 and 7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.
- c. It shall not be the defense of the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

9. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject to under Section 311 of the Federal Water Pollution Control Act and applicable provisions under Mississippi Law pertaining to transportation, storage, treatment, or spillage of oil or hazardous substances.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, or local laws or regulations.

11. Severability

The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

12. Expiration of Permit

At least 180 days prior to the expiration date of this permit pursuant to the State law and regulation, the permittee who wishes to continue to operate under this permit shall submit an application to the Permit Board for reissuance. The Permit Board may grant permission to submit an application later than this, but no later than the expiration date of the permit.

13. Protection of Confidential Information

- a. Pursuant to Miss. Code Ann. § 49-17-39 and 40 CFR 123.41, the Permit Board shall make available to the public all information contained on any form and all public comments on such information. Effluent data and information concerning air or water quality shall also be made available to the public. Information that is determined by the Commission to be trade secrets shall not be disclosed to the public without prior consent of the source of such information. When a claim of confidentiality is made by a person in accordance with the provisions of Miss. Code Ann. § 49-17-39, a recommendation on the questions of confidentiality shall be made by the Commission and forwarded to the Regional Administrator (or his/her designee) of EPA for his concurrence in such determination of confidentiality.
- b. A copy of a State, UIC, or NPDES permit application, public notice, fact sheet, draft permit and other forms relating thereto, including written public comment and other reports, files and information relating to the application not classified as confidential information by the Commission pursuant to Part II.B.13.a., shall be available for public inspection and copying during normal business hours at the office of the Department in Jackson, Mississippi.
- c. Upon determination by the Commission that information submitted by a permit applicant is entitled to protection against disclosure as trade secrets, the information shall be so labeled and otherwise handled as confidential. Copies of the information and a notice of the Commission's action shall be forwarded to the Regional Administrator (or his/her designee). In making its determination of entitlement to protection as a trade secret, the Commission shall follow the procedure set forth in Miss. Code Ann. § 49-17-39. In the event the Commission denies the claim of confidentiality, the applicant shall have, upon notification thereof, the right to appeal the Commission's determination in the same manner provided for other orders of the Commission. No disclosure, except to EPA, shall be allowed until any appeal from the determination of the Commission is completed.

14. Spill Prevention and Best Management Plans

Any permittee which has above ground bulk storage capacity, of more than 1320 gallons or any single container with a capacity greater than 660 gallons, of materials and/or liquids (including but not limited to, all raw, finished and/or waste material) with chronic or acute potential for pollution impact on waters of the State and not subject to Mississippi Hazardous Waste Management Regulations or 40 CFR 112 (Oil Pollution Prevention) regulations shall provide secondary containment as found in 40 CFR 112 or equivalent protective measures such as trenches or waterways which would conduct any tank releases to a permitted treatment system or sufficient equalization or treatment capacity needed to prevent chronic/acute pollution impact.

PART III

A. REOPENER CLAUSE

This permit shall be modified, or alternately, revoked and reissued, to comply with any applicable effluent standard, limitation or storm water regulation issued or approved under Section 301(b)(2)(C), and (D), 304(b)(2), 307(a)(2) and 402(p) of the Federal Water Pollution Control Act if the effluent standard, limitation or regulation so issued or approved:

1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
2. Controls any pollutant not limited in the permit.

B. CLOSURE REQUIREMENTS

Should the permittee decide to permanently close and abandon the premises upon which it operates, it shall so notify the Permit Board no later than 90 days prior to doing so. This Closure Plan shall address how and when all manufactured products, by-products, raw materials, stored chemicals, and solid and liquid waste and residues will be removed from the premises so that no potential environmental hazard to the waters of the State will be presented.

C. REQUIREMENTS REGARDING COOLING AND BOILER WATER ADDITIVES

Notification shall be made to the permitting authority in writing not later than sixty (60) days prior to initiating the addition of any chemical product to the cooling water and/or boiler water which is subject to discharge, other than those previously approved and/or used. Such notification should include, but not be limited to:

1. Name and composition of the proposed additive,
2. Proposed discharge concentration,
3. Dosage addition rates,
4. Frequency of use,
5. EPA registration, if applicable, and
6. Aquatic species toxicological data.

Written approval must be received from the permitting authority prior to initiating use.

D. OTHER STANDARD CONDITIONS

A Storm Water Pollution Study shall be submitted six months after permit issuance. The Study shall contain the following elements. The rainfall events that cause a bypass of the treatment system shall be identified. Both the intensity and duration of the events shall be listed. The capacity of the system shall be compared to the water generated by a 10-year worst case 24-hour storm. A process storm water minimization plan shall be developed to assess options on diverting flow from plant areas no longer involved in production. In addition, process areas shall be investigated to determine whether berming specific process areas to minimize flow is feasible. A compliance schedule that outlines the steps the facility will take to comply with the upcoming new permit limits shall be submitted within one year of permit issuance.

E. ACUTE BIOASSAY REQUIREMENTS

The Water Quality Standards of Mississippi require that all waters be free from substances in concentrations or combinations which are harmful to humans, animals, or aquatic life (State of Mississippi, Water Quality Criteria for Intrastate, Interstate and Coastal Waters, page 3, adopted November 16, 1995). In accordance with such requirements, the permittee is authorized to discharge from outfall 002 only in accordance with the following conditions:

1. The permittee shall submit any existing toxicity data for review by the Mississippi Office of Pollution Control within 30 days of the effective date of this permit.
 2. The permittee shall perform static renewal (tests that exceed 48 hours shall be renewed), definitive (a control and five effluent concentrations) toxicity tests at 25°C in accordance with Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or the most recent edition. Acute toxicity tests will be conducted on 24-hour composite samples of effluent, and tests must be initiated within 36-hours of completion of the sampling period.
-
- a. If the Mississippi Office of Pollution Control determines the receiving stream is freshwater, the permittee must use both the following test organisms and test durations:
 - (1) Pimephales promelas (< 24-hrs. of age) - 96 hour
 - (2) Ceriodaphnia dubia - 48 hour
 - b. If the Mississippi Office of Pollution Control determines the receiving stream is marine or estuarine, the permittee must use both the following test organisms and test durations:
 - (1) Menidia beryllina - 96 hour
 - (2) Mysidopsis bahia - 48 hour
 - c. Dilution water used for these tests shall consist of reagent grade water, defined as distilled or deionized water that does not contain substances which are toxic to the test organisms. For freshwater tests, dilution water shall consist of reagent grade chemicals or mineral water combined to make moderately hard dilution water according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. For estuarine testing, dilution water shall consist of synthetic seawater or hypersaline brine combined to achieve a salinity of 20 parts per thousand according to Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. These dilution waters will be deemed acceptable if the survival of the control organisms in the toxicity tests is 90% or greater.
 - d. A standard reference toxicant quality assurance test (acute) shall be conducted concurrently with the effluent tests using both species used in the toxicity tests. Alternatively, if a lab conducts monthly QA/QC reference toxicant tests for both species as part of their SOP, these results may be submitted in lieu of the above mentioned concurrent tests. In either case the reference toxicant test results must be submitted in the final report as well as on the Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form.

3. The permittee shall conduct the first series of tests specified in Section 2 above within 90 days of the issuance of the permit. The tests shall be conducted quarterly thereafter for twelve (12) consecutive months, provided that the acute LC_{50} is greater than or equal to 3%. After the first year of testing, the frequency of monitoring will be reduced to once per six months for the life of the permit. Sampling shall be timed to cover the seasonal extremes of the year (hot-dry and cold-wet). The results of these acute toxicity tests shall be reported to the Mississippi Environmental Quality Permit Board on the next quarterly discharge monitoring report. Final acute toxicity test results shall be in report form as outlined in Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, (EPA-600/4-90/027) or most recent edition. Along with this report, the permittee must submit a completed Mississippi Office of Pollution Control NPDES Whole Effluent Toxicity Testing Report Form within two weeks following test completion.
4. If either toxicity test results in an LC_{50} value of less than 3%, the permittee shall initiate a second toxicity test within 2 weeks after the completion of the first toxicity test using the organism(s) that failed. The LC_{50} determinations from these tests shall be reported to the Mississippi Environmental Quality Permit Board within two weeks after completion the test.
5. In the event that the results of any toxicity test reveals that the LC_{50} of the permittee's effluent is less than 3%, then this finding will constitute a violation of Part I of this permit. In the event the permittee passes the second toxicity test, the permittee shall resume testing in accordance with the testing schedule set forth in the permit. In the event the permittee fails the second WET test, the permittee shall submit a Toxicity Reduction Evaluation Plan (TREP) within 45 days following completion of the follow-up tests to reduce the toxicity of the effluent to safe levels.¹ The first phase of the TREP shall include monitoring to characterize the toxicity of the effluent.

In addition to the specific conditions of this permit, the permittee shall comply with all applicable conditions of 40 CFR 122.7 and 40 CFR 122.61 (06-03-93).

¹Safe levels will be determined by the Mississippi Pollution Control Permit Board.

*Contact the Mississippi Office of Pollution Control Laboratory for information on most recent edition(s) of methods manual.

PERMIT RATIONALE
HERCULES INCORPORATED
MS0001830
HATTIESBURG, MS
FORREST COUNTY
DECEMBER 9, 1996

DRAFT

I. GENERAL INFORMATION

1. Nature of business:

Manufacture of modified resins, resin solutions and paper chemicals.

2. Applicable guidelines:

2000-2002			existing limits		
	Monthly ave	Daily Max	Basis	ave	max
BOD5	79.54 (175.2)	53 (116.8)	WQ	(1634)	(3051)
TSS	191 (421)	531 (1170)	BPJ	(579)	(1648)
TOC	796 (1755)	1107 (2436)	BPJ	(2500)	(3800)
Oil/grease	53.1 (117)	79.5 (175)	BPJ	(660)	(990)
Phenol	.54 (1.19)	1.6 (3.5)	WQUAL.LIM.	(3.3)	(4.9)

5. Waste Water Treatment:

Sedimentation, floatation, neutralization, and carbon adsorption.

6. Application information:
Form 2-c

	max daily lb/d	max 30 day	long term ave
BOD	1,747	871	445
TOC	1,352	742	448
COD	3,309	-	-
TSS	542	172	126
NH3N	47	-	-
FLOW	1.94 MGD	.96 MGD	.69 MGD

6.

chem	conc mg/l	chem	conc mg/l
Br	7.1	Mo	.009
F	.15	Mg	.07
N(ORG)	8.9	Sn	.01
Oil&GRE	161	Ni	.01
Sulfate	480	Se	.009
Sulfide	3.0	Th	.018
Sulfite	3.8	Zinc	.04
surfact	.17	Phenols	.03
Al	.22	Toluene	.235
Boron	.22	BBPhthal ates	.036
Fe	.22	Phenol	.829

7. Standards for discharge 1997 to 1999

The existing basis for limits, i.e. the dilution of the Bowie River, will be allowed for a three year period. The Categorical\Best Professional Judgement based limits which are more stringent than limits based upon the dilution of the Bowie River will be enforced. After two years the limits based on the tributary (7Q10=0) will be in place. These limits are more stringent than Categorical\Best Professional Judgement derived limits and are derived directly from State of Mississippi Water Quality Standards and Regulations.

1.BOD5

Categorical limits: Gum and Wood Chemical Manufacturing and Rubber Manufacturing

Product lbs/d	40cfr ref	lb/1000lb prod		lb/day	
		30day ave	max	avg	max
resins 345,177	454.31	1.1	2.08	379.7	718
rubber 40,800	428.103	.12	.08	3.3	4.9
misc					
paper 549,678	*	1.0	1.87	<u>549.6</u>	<u>1028</u>
chem				933	1751

*AVE BOD= $379.7/385,977 = 1.0$ (LBS BOD/1000 LBS)

MAX BOD= $722.9/385,977 = 1.87$ (LBS BOD/1000 LBS)

cont'

~~These limits are more stringent than previous limits that were based on higher production rates.i.e. 1631 ave,3051 max.~~

The Water Quality Monitoring Branch recommended a BOD limit of 2425 LBS/DAY . The categorical limit is more stringent and will be used :

2.TSS

Categorical limits

Product lbs/d	40cfr ref	lb/1000lb prod		lb/day	
		30day ave	max	avg	max
resins 345,177	454.31	0.475	1.38	164	476.5
rubber 40,800	428.103	0.24	0.16	9.8	6.5
misc					
paper 549,678	*	0.45	1.25	<u>247.3</u>	<u>687</u>
				421	1170

*AVE BOD= $173.8/383,977 = .45$ (LBS BOD/1000 LBS)

MAX BOD= $483./385,977 = 1.25$ (LBS BOD/1000 LBS)

These limits are more stringent than previous limits that were based on higher production rates.i.e. 579 ave,1648 max.

3. TOC

There are no established limits for TOC, therefore the existing limits will be used factoring in the reduced production as compared to production during the last permit period. i.e.:
 $935655/1292400(\text{LBS OF PRODUCTS}) = .72$ $.72 * 3800 = 2436 \text{ LBS/D MAX}$
 $.72 * 2500 = 1755 \text{ LBS/D AVE}$. These limits are being met by current technology, activated carbon filter.

4. Oil & grease

The current mass limit, 660 lbs/d ave, 990 lbs/d max are less than the 10 ppm limit to prevent an oil sheen. i.e. :
 $660 / (116.3 * 8.34) = .68 \text{ ppm}$

5. Phenol

Phenol limits are established by applying the State water quality limits to the river and estimating the maximum allowable concentration in the effluent:

$$.96 \text{ mgd} * C * 8.34 = .3 * (116.3 + 1.4) * 8.34$$

$$C = 37 \text{ PPM MAX.} = 294.4 \text{ LBS/D}$$

$$C = 12.6 \text{ PPM AVE.} = 117.4 \text{ LBS/D}$$

Current permit limits are more stringent and will be maintained.
4.9 lbs/d max, 3.3 lbs/d ave.

The current technology, activated carbon filter, is well suited for removing phenol. Since current limits have been maintained they will be continued as representing technology based limits.

LIMITS 2000-2002

1. BOD

Water Quality Monitoring limit for a 7Q10=0 stream is BOD5 ave = 10mg/l.

Mass limits BOD5

$$1.4 * 8.34 * 10 \text{ mg/l} = 117 \text{ lbs/d ave}$$

$$1.4 * 8.34 * 15 \text{ mg/l} = 175 \text{ lbs/d max}$$

Current discharge from application

Max.daily	Max 30 day ave
1747lbs/d	871lbs/d

Current control technology has not been reaching the proposed limits.

2.TSS

Proposed limits are based upon Best Professional Judgement.

AVE= 30PPM MAX= 45PPM
 $1.4\text{MGD} \times 8.34 \times 30\text{MG/L} = 350\text{ LBS/D}$
 $1.4\text{MGD} \times 8.34 \times 45\text{MG/L} = 525\text{ LBS/D}$

The existing system can meet the ave but not the max limit.
FORM 2-C:

126 LBS/D AVE
542 LBS/D MAX

3.Oil and Grease

Proposed limits : 10 mg/l ave , 15 mg/l max
 $1.4 \times 8.34 \times 10\text{ mg/l} = 116.7\text{ lbs/d}$
 $1.4 \times 8.34 \times 15\text{ mg/l} = 175\text{ lbs/d}$

The proposed limits are based upon the minimum amount of oil that will produce an oil sheen on the water surface.

4.Phenol

State Water Quality Limits are .3 mg/l max, .102 mg/l ave.
These limits translate to :

$.3\text{ mg/l} \times 1.4\text{ MGD} \times 8.34 = 3.5\text{ LBS/D}$
 $.102\text{ MG/L} \times 1.4\text{ MGD} \times 8.34 = 1.19\text{ LBS/D}$

These discharge limits are more stringent than previous limits.
(4.9 lbs/d , 3.3 lbs/d ave) Form 2-c list Phenol at a concentration of .829 mg/l. This concentration is above the proposed limits.

5.TOC

There are no established limits for TOC, therefore the existing limits will be used factoring in the reduced production as

compared to production during the last permit period. ie:
 935655/1292400 (LBS OF PRODUCTS) = .72 $.72 * 3800 = 2436$ LBS/D MAX
 $.72 * 2500 = 1755$ LBS/D AVE. These limits are being met by current
 technology, activated carbon filter.

PROPOSED LIMITS FOR DISCHARGE

2000-2002			existing limits		
	Monthly ave	Daily Max	Basis	ave	max
BOD5	79.54 (175.2)	53 (116.8)	WQ	(1634)	(3051)
TSS	191 (421)	531 (1170)	BPJ	(579)	(1648)
TOC	796 (1755)	1107 (2436)	BPJ	(2500)	(3800)
Oil/grease	53.1 (117)	79.5 (175)	BPJ	(660)	(990)
Phenol	.54 (1.19)	1.6 (3.5)	WQUAL.LIM.	(3.3)	(4.9)

PROPOSED LIMITS, 1997-2000

	Monthly ave	Daily Max			
BOD5	424 (933)	795 (1751)	CAT	(1634)	(3051)
TSS	191 (421)	531 (1170)	CAT	(579)	(1648)
TOC	796 (1755)	1107 (2436)	BPJ	(2500)	(3800)
Oil/grease	300 (660)	450 (990)	BPJ	(660)	(990)
Phenol	1.5 (3.3)	2.2 (4.9)	WQUAL.LIM.	(3.3)	(4.9)

BATEA Statement:

We believe the proposed limits represent Best Available Control Technology that is Economically Achievable. This is based upon our Best Professional Judgement.

TOXICITY SCREENING

Qw = .96 MGD (TOTAL 1.4 INCLUDES NON-CONTACT COOLING WATER)
 Qr = 116.3 MGD
 $IWC = .96 \text{ MGD} / (1.4 + 116.3) * 100\% = .8\%$
 Xr = 0 assumed for all parameters

total Al

$Xw = .220 * 10 = 2.2$ (less than 12 samples)
 $Xt = 2.2 * .96 / (1.4 + 116.3) = .02 \text{ mg/l}$
 AWQC = .750 mg/l
 CWQC = .087 mg/l

total Boron

$X_w = .22 * 10 = 2.2$ (less than 12 samples)

$X_t = 2.2 * .96 / (1.4 + 116.3) = .020$

AWQC=no data

CWQC=.750 mg/ l

total Ni

$X_w = .01 * 10 = .1$ (less than 12 samples)

$X_t = .1 * .96 / (1.4 + 116.3) = .0008$

AWQC=.787 mg/l

CWQC=.087 mg/l

total Selenium

$X_w = .009 * 10 = .09$ (less than 12 samples)

$X_t = .09 * .96 / (1.4 + 116.3) = .0008$

AWQC=.02 mg/l

CWQC=.005 mg/l

total Zinc

$X_w = .04 * 10 = .4$ (less than 12 samples)

$X_t = .4 * .96 / (1.4 + 116.3) = .0042$

AWQC= .0636 mg/l

CWQC= .0581 mg/l

Phenol

$X_w = .829$ mg/l

$X_t = .829 * .96 / (1.4 + 116.3) = .0083$ mg/l

AWQC=.3 mg/l

CWQC=.1 mg/l

ACUTE TOXICITY SCREENING SUMMARY (EXISTING LIMIT BASIS)

Parameter	AWQC mg/l	Xt mg/l	PASS/FAIL
Total Al	.750	.026	PASS
Total Boron	no data	.02	
Total Nickel	.787	.0012	PASS
Total Selenium	.02	.001	PASS
Total Zinc	.0636	.005	PASS
Phenol	.3	.099	PASS

CHRONIC TOXICITY SCREENING SUMMARY

Parameter	CWOC mg/l	Xt mg/l	PASS/FAIL
Total Al	.087	.026	PASS
Total Boron	.750	.02	PASS
Total Nickel	.087	.0012	PASS
Total Selenium	.005	.001	PASS
Total Zinc	.0581	.005	PASS
Phenol	.102	.099	PASS

TOXICITY SCREENING MATRIX

				permit requirements		
IWC	CSSa	CSSp	WETp	CSl	WETl	WETm
2.4%	P	P	P	Y	Y	N/A

TOXICITY SCREEN FOR TRIBUTARY 1999**ACUTE TOXICITY SCREENING SUMMARY**

($X_t = X_w * .96 / 1.4$)

Parameter	AWOC mg/l	Xt mg/l	PASS/FAIL
Total Al	.750	1.5	FAIL
Total Boron	no data		
Total Nickel	.787	.68	FAIL
Total Selenium	.02	.062	FAIL
Total Zinc	.0636	.272	FAIL
Phenol	.3	.564	FAIL

CHRONIC TOXICITY SCREENING SUMMARY

($X_t = X_w * .96 / 1.4$)

Parameter	CWOC mg/l	Xt mg/l	PASS/FAIL
Total Al	.087	1.5	FAIL
Total Boron	.750	1.5	FAIL
Total Nickel	.087	.068	PASS
Total Selenium	.005	.062	FAIL
Total Zinc	.0581	.272	FAIL
Phenol	.102	.564	FAIL

TOXICITY SCREENING MATRIX

permit requirements

IWC	CSSa	CSSp	WETp	CSl	WETl	WETm
100%	f .	f	N/A	Y	Y	N/A

FACT SHEET

APPLICATION FOR
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
PERMIT TO DISCHARGE WASTEWATER TO WATERS
OF THE STATE OF MISSISSIPPI

Application No.: MS0001830 (Reissuance) Date: January 9, 1997

1. SYNOPSIS OF APPLICATION

a. Name and Address of Applicant

Hercules Incorporated
613 West 7th Street
P.O. Box 1937
Hattiesburg, MS 39401
Contact: Mr. Charles Jordan
(601) 545-3450

b. Description of Applicant's Operation

Manufacture of modified resins, resin solutions and paper chemicals.

2. Applicable guidelines:

40CFR Part 454 Gum and Wood Chemical Manufacturing
Point Source Category, subpart c woodrosin, turpentine and
pine oil.

40CFR Part 428 Rubber Manufacturing Point Source
Category,

c. Production Capacity of Facility

N/A

d. Description of Existing Pollution Abatement Facilities

Sedimentation, floatation, neutralization, and carbon
adsorption.

e. Applicant's Receiving Waters

Bowie River

f. Description of Discharges

Outfall 001 - 0.96 MGD (internal outfall into 002)
Outfall 002 - 1.4 MGD

Bowie River 7Q10 = 116.3 mgd

2. PROPOSED EFFLUENT LIMITATIONS

2000-2002 limits existing

	Monthly ave	Daily Max	Basis	ave
max				
BOD5 (3051)	79.54 (175.2)	53 (116.8)	WQ	(1634)
TSS (1648)	191 (421)	531 (1170)	BPJ	(579)
TOC (3800)	796 (1755)	1107 (2436)	BPJ	(2500)
Oil/grease (990)	53.1 (117)	79.5 (175)	BPJ	(660)
Phenol (4.9)	.54 (1.19)	1.6 (3.5)	WQUAL.LIM.	(3.3)

3. MONITORING REQUIREMENTS

The applicant will be required to monitor regularly for flow and those parameters limited in Section 2 above with sufficient frequency to ensure compliance with the permit conditions. Frequency, methods of sampling, and reporting dates will be specified in the final permit.

4. PROPOSED COMPLIANCE SCHEDULE FOR ATTAINING EFFLUENT LIMITATIONS

The facility will have three years to achieve proposed permit requirements.

5. PROPOSED CONDITIONS OF APPLICABILITY AND OTHER REQUIREMENTS

	2000-2002			existing limits
	Monthly ave	Daily Max	Basis	ave max
BOD5	79.54 (175.2)	53 (116.8)	WQ	(1634) (3051)
TSS	191 (421)	531 (1170)	BPJ	(579) (1648)
TOC	796 (1755)	1107 (2436)	BPJ	(2500) (3800)
Oil/grease	53.1 (117)	79.5 (175)	BPJ	(660) (990)
Phenol	.54 (1.19)	1.6 (3.5)	WQUAL.LIM.	(3.3) (4.9)

6. WATER QUALITY STANDARDS AND EFFLUENT STANDARDS APPLIED TO THE DISCHARGE

See attached permit rationale.

7. PROCEDURES FOR THE FORMULATION OF FINAL DETERMINATIONS

a. Comment Period

The Mississippi Office of Environmental Quality Permit Board proposes to issue an NPDES permit to this applicant subject to the effluent limitations and special conditions outlined above. These determinations are tentative.

Interested persons are invited to submit written comments on the permit application or on the Permit Board's proposed determinations to the following address:

Mississippi Department of Environmental Quality
Office of Pollution Control
P. O. Box 10385
Jackson, Mississippi 39209

Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing Jerry Cain at the Permit Board's address or calling Charles Cook at 961-5171.

All comments received prior to December 31, 1996, will be considered in the formulation of final determinations with regard to this application.

b. Public Hearing

The Permit Board may hold a public hearing if there is a significant degree of public interest in a proposed permit or group of permits. Public notice of such a hearing will be circulated in newspapers in the geographical area of the discharge and to those on the agency's mailing list at least 30 days prior to the hearing.

Following the public hearing, the Permit Board may take such modifications in the terms and conditions of the proposed permits as may be appropriate and shall issue or deny the permit. Notice of issuance or denial will be circulated to those who participated in the hearing and to appropriate persons on the mailing list.

c. Issuance of the Permit When No Public Hearing is Held

If no public hearing is held, and, after review of the comments received, the Permit Board's determinations are substantially unchanged, the permit will be issued and become effective immediately.

If no public hearing is held, but there have been substantial changes, public notice of the Permit Board's

revised determinations will be made. Following a 30-day comment period, the permit will be issued and become effective immediately, unless a public hearing is granted.

PUBLIC NOTICE

Mississippi Environmental Quality Permit Board
P. O. Box 10385
Jackson, MS 39209
Telephone No. (601) 961-5171

February 1, 1997

Hercules Incorporated, located at 613 West 7th Street P.O.10385 Hattiesburg, Ms. 39209, has applied to the Mississippi Environmental Quality Permit Board for the reissuance of an NPDES Permit to discharge treated chemical process waste water and non-contact coolingwater from a waste water treatment system to a tributary of the Bowie River. The applicant's operation manufactures resins and paper chemicals. One discharge is described in the application.

The environmental impact of this project has been evaluated and the staff of the Permit Board believes that, with proper environmental constraints and limitations on the applicant, this project will operate within all State and Federal environmental laws and standards. Therefore, the staff of the Board has preliminarily decided, based on available information, to recommend to the Board that a permit be issued containing numerous environmental regulatory constraints specifically stated in the draft permit. However, before proceeding further with the staff evaluation, public comments are being solicited. The staff recommendation to the Board, as well as the Board decision, will be made only after a thorough consideration of all public comments.

Persons wishing to comment upon or object to the proposed determinations are invited to submit comments in writing to Jerry Cain at the Permit Board's address shown above, no later than February 31,1996. All comments received by that date will be considered in the formulation of final determinations regarding the application. A public hearing will be held if the Permit Board finds a significant degree of public interest in the proposed permit.

Additional details about the application and the proposed determination, a sketch showing the location of the discharge, and a copy of the draft permit are available by writing or calling Charles Cook at the Permit Board's address and telephone number shown above. Also, this and other information is available for review and copying during normal business hours at the Southport Center Building located at 2380 Highway 80 West, Jackson, MS.

Please bring the foregoing to the attention of persons whom you know will be interested.